Docket #1638 Date Filed: 07/08/2026

United States Courts
Southern District of Texas
FILED

JUL 07 2026

Nathan Ochsner, Clerk of Court

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P.O. Box 4111
Columbus, GA 31914
Pro Se Movant

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

In re: ModivCare Inc., et al.
Case No. 25-90309
Debtors.

MOTION FOR LIMITED RELIEF FROM PLAN INJUNCTION

(For the Limited Purpose of Liquidating a Prepetition Tort Claim and Pursuing Available Insurance Proceeds)

1. Relief Requested

Movant respectfully requests limited relief from the Plan Injunction under Article XI of the confirmed Chapter 11 Plan solely to permit the liquidation of a prepetition tort claim in a non-bankruptcy forum.

2. Background

Movant's claim arises from events occurring on August 8, 2024, prior to the bankruptcy petition date. Movant seeks only to establish liability and damages, if any, for purposes of determining available insurance coverage.

3. Limited Nature of Relief

Movant does not seek recovery from the Debtors, the Reorganized Debtors, their bankruptcy estates, or their assets. Any recovery sought is limited solely to third-party insurance proceeds, to the extent such coverage exists.

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4. Request for Relief

Movant respectfully requests entry of an order modifying the Plan Injunction solely to permit the underlying claim to proceed in an appropriate non-bankruptcy forum for liquidation purposes.

Respectfully submitted,

Lus Lucy Rosario, Pro Se Movant

Date: 6-29-26

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

In re: ModivCare Inc., et al.
Case No. 25-90309
Debtors.

PROPOSED ORDER

Upon consideration of the **Motion for Limited Relief from Plan Injunction**, the Court finds that the requested relief is limited and does not seek recovery from the Debtors or estate assets.

IT IS ORDERED that the Plan Injunction is modified solely to permit Movant to liquidate the prepetition tort claim in a non-bankruptcy forum for the limited purpose of determining liability and damages, if any, and insurance coverage, if available.

Any recovery shall be limited exclusively to applicable third-party insurance proceeds, to the extent such coverage exists.

SO ORDERED.

_____

UNITED STATES BANKRUPTCY JUDGE

Date: _____

CERTIFICATE OF SERVICE

I certify that on 6/29/26, a true and correct copy of the Motion for Limited Relief from Plan Injunction and Proposed Order was served by United States Mail upon the following parties:

Clerk

Office of the Clerk /United States Bankruptcy Court
Southern District of Texas
Houston Division
P.O. Box 61010
Houston, TX 77208

Debtors' counsel

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Claims agent

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Case 25-90309 Document 1638-1 Filed in TXSB on 07/08/26 Page 3 of 3

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Nathan Ochsner, Clerk of Court

TO: Office of the Clerk
United States Bankruptcy Court
Southern District of TEXAS
Houston Division
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