Docket #0014 Date Filed: 7/27/2026

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

In re:	§	Chapter 11
	§	
MODIVCARE INC., et al.,	§	Bankruptcy Case No. 25-90309 (ARP)
	§	
Debtors.	§	(Jointly Administered)
MODIVCARE TOPCO, LLC,	§	
Appellant,	§	Civil Action No. 4:26-cv-03651
v.	§	
WHITE & CASE LLP and	§	
ALIXPARTNERS, LLP,	§	
Appellees.	§	

EMERGENCY MOTION OF WALKER & PATTERSON, P.C. TO WITHDRAW AS COUNSEL FOR APPELLANT AND FOR EXPEDITED CONSIDERATION

Walker & Patterson, P.C. (the "Firm"), counsel of record for Appellant ModivCare Topco, LLC ("Appellant"), respectfully moves on an emergency basis to withdraw as counsel and requests expedited consideration, stating:

Relief Requested and Basis for Withdrawal

1. The Firm appears as counsel for Appellant in this appeal from the Bankruptcy Court's April 30, 2026 order [Bankr. ECF No. 1502].

2. By letter dated July 23, 2026, Appellant terminated the Firm's representation, effective immediately, and directed the Firm to cease all work and take no further action on its behalf. Good cause therefore exists for the Firm's withdrawal. This Motion is filed solely to comply with the Firm's professional obligations and discloses no confidential information.

3. Appellant's last known address and contact for notice purposes is: ModivCare Topco, LLC, Attn: Alessandra Melloni, General Counsel and Secretary, 6900 E. Layton Ave., Suite 1200, Denver, CO 80237.

2590309260727000000000004

Basis for Emergency Consideration

4. Emergency consideration is warranted because deadlines in this appeal are running. Appellant's opening brief was due July 24, 2026. The Firm advised Appellant of that deadline in writing before it passed, but, having been terminated and instructed to take no further action the Firm was not authorized to file the brief or to seek an extension on Appellant's behalf. The Firm remains counsel of record while unable to act. Prompt withdrawal is necessary so that Appellant, through successor counsel of its choosing, may seek appropriate relief regarding the briefing schedule and otherwise protect its interests in this appeal. Appellant has stated that it will designate successor counsel, and the Firm will cooperate in the orderly transfer of the file, including the draft brief.

5. This Motion is made for good cause and not for purposes of delay. Because the withdrawal is occasioned by the client's own termination of the representation, no party will be unfairly prejudiced.

WHEREFORE, Walker & Patterson, P.C. respectfully requests that the Court consider this Motion on an expedited basis, enter an order substantially in the form submitted herewith permitting the Firm and its attorneys to withdraw as counsel for Appellant ModivCare Topco, LLC, and grant such other and further relief as is just and proper.

Dated: July 26, 2026

Respectfully submitted,

WALKER & PATTERSON, P.C.

By: */s/ Johnie Patterson*

Johnie Patterson
SBN 15601700
P.O. Box 61301
Houston, Texas 77208-1301
(713) 956-5577 (telephone)
(713) 956-5570 (facsimile)
jjp@walkerandpatterson.com
Counsel for Appellant ModivCare Topco, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned conferred with counsel regarding the relief requested in this Motion and the need for emergency consideration. Charles R. Koster, counsel for White & Case LLP, advised that White & Case LLP is opposed to the relief requested. The undersigned contacted counsel for AlixPartners, LLP by email on the afternoon of Friday, July 24, 2026; no response had been received as of the filing of this Motion. A copy of this Motion has also been provided to ModivCare Topco, LLC through its General Counsel.

/s/ Johnie Patterson
Johnie Patterson

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2026, a true and correct copy of the foregoing Emergency Motion was served via the Court's CM/ECF system on all parties consenting to service through the same, and via email and U.S. mail upon ModivCare Topco, LLC, Attn: Alessandra Melloni, General Counsel and Secretary, 6900 E. Layton Ave., Suite 1200, Denver, CO 80237.

/s/ Johnie Patterson
Johnie Patterson

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

In re:	§	Chapter 11
	§	
MODIVCARE INC., et al.,	§	Bankruptcy Case No. 25-90309 (ARP)
	§	
Debtors.	§	(Jointly Administered)
MODIVCARE TOPCO, LLC,	§	
Appellant,	§	Civil Action No. 4:26-cv-03651
v.	§	
WHITE & CASE LLP and	§	
ALIXPARTNERS, LLP,	§	
Appellees.	§	

ORDER GRANTING EMERGENCY MOTION OF WALKER & PATTERSON, P.C. TO WITHDRAW AS COUNSEL FOR APPELLANT

[Relates To ECF No. _____]

Before the Court is the Emergency Motion of Walker & Patterson, P.C. (the "Firm") to Withdraw as Counsel for Appellant ModivCare Topco, LLC and for Expedited Consideration (the "Motion"). Having considered the Motion, the Court finds that expedited consideration is warranted, that good cause exists, and that the Motion should be GRANTED. It is therefore

ORDERED that Walker & Patterson, P.C. and its attorneys, including Johnie Patterson and Miriam Goott, are permitted to withdraw as counsel of record for Appellant ModivCare Topco, LLC, effective immediately, and it is further

ORDERED that, until successor counsel appears, all notices and service upon Appellant shall be directed to: ModivCare Topco, LLC, Attn: Alessandra Melloni, General Counsel and Secretary, 6900 E. Layton Ave., Suite 1200, Denver, CO 80237.

Signed: _____, 2026

_____
UNITED STATES DISTRICT JUDGE