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)

REORGANIZED DEBTORS' EIGHTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (AMENDED AND SUPERSEDED CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE 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' 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 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,[2] collectively, the "***Debtors***" and after the Effective Date, collectively, the "***Reorganized Debtors***") respectfully state the following in support of this omnibus claims objection (this "***Objection***").

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order, substantially in the form attached hereto (the "***Proposed Order***"), disallowing and expunging each of the claims listed under the "Superseded Claim No." header on **Schedule 1** to the Proposed Order (the "***Superseded Claims***") because such claims were amended and replaced by the corresponding, subsequently filed claim identified under the "Amended/Superseding Claim No." header on **Schedule 1** (the "***Surviving Claims***"), each of which was filed by the same claimant on account of the same liability. For the avoidance of doubt, the Objection does not seek to disallow or modify the Surviving Claims; however, the Reorganized Debtors reserve their rights related thereto, including but not limited to, the right to object to the Surviving Claims on any applicable grounds.

JURISDICTION AND VENUE

2. 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)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each of the Superseded Claims that are the subject of this Objection were asserted on proof of claim forms (each a "***Proof of Claim***" and collectively the "***Claim Forms***") filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the "***Plan***"), as applicable.

Debtors' estates based on the filing of a Proof of Claim, the holders of the Superseded Claims (each a "***Claimant***" and collectively the "***Claimants***") have submitted to the Court's jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "***Bankruptcy Code***"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "***Bankruptcy Local Rules***"), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. 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* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order[3] which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

[3] Docket No. 1055.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered 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] (the "***Claims Bar Date Order***") setting, *inter alia*, (i) October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the "***General Bar Date***"), and (ii) February 16, 2026, at 5:00 p.m. (prevailing Central Time) as the deadline for all governmental units (as defined in section 101(27) of the Bankruptcy Code) to assert a claim (as defined in section 101(5) of the Bankruptcy Code) that arose on or prior to the Petition Date (the "***Governmental Bar Date***" and together with the General Bar Date, as applicable, depending on whether the claimant is a governmental unit or non-governmental unit, the "***Claims Bar Date***").

9. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, "set forth with specificity the legal and factual basis for the alleged claim," and "include supporting documentation or an explanation as to why such documentation is not available." Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant "shall not be treated as a creditor with respect to such claim for purposes of voting and ***distribution***." *Id.* at ¶ 20 (emphasis added).

10. On August 23, 2025, the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "***Claims and Noticing Agent***"), served notice of the Claims Bar Date (the "***Bar Date Notice***") to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order, and, as necessary, supplemented such

service. *See* Bar Date Affidavits of Service.[4] Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of 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* [Docket No. 142].

11. The Reorganized Debtors also listed numerous claims in their Schedules[5] (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the "***Claims***"), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain "first day" orders and other orders entered in the Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors' Claims and Noticing Agent (the "***Claims Register***").[6]

12. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the "***Omnibus Objection Procedures Order***") approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the "***Objection***

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[4] "***Bar Date Affidavits of Service***" means, collectively, (i) *Certificate of Service* [Docket No. 113]; (ii) *Certificate of Service* [Docket No. 353]; (iii) *Supplemental Certificate of Service* [Docket No. 400]; (iv) *Supplemental Certificate of Service* [Docket No. 442]; (v) *Supplemental Certificate of Service* [Docket No. 492]; (vi) *Supplemental Certificate of Service* [Docket No. 602]; (vii) *Supplemental Certificate of Service* [Docket No. 603]; (viii) *Supplemental Certificate of Service* [Docket No. 700]; (viii) *Supplemental Certificate of Service* [Docket No. 727]; (ix) *Supplemental Certificate of Service* [Docket No. 1067]; (x) *Supplemental Certificate of Service* [Docket No. 1127]; (xi) *Supplemental Certificate of Service* [Docket No. 1143]; (xii) *Supplemental Certificate of Service* [Docket No. 1148]; (xiii) *Supplemental Certificate of Service* [Docket No. 1184]; (xiv) *Supplemental Certificate of Service* [Docket No. 1285]; and (xv) *Supplemental Certificate of Service* [Docket No. 1320].

[5] On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the "***Schedules***") and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

[6] Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) ("A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.").

Procedures"). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Superseded Claims along with this Objection.

13. On July 13, 2026, the Court entered the *Order Granting Reorganized Debtors' Second Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1649], which extended the Claims Objection Deadline by an additional ninety (90) days through and including September 27, 2026.

THE SUPERSEDED CLAIMS

14. The review of the Claims Register by the Reorganized Debtors and their advisors allowed them to identify the Superseded Claims. This Objection seeks to disallow and expunge the Superseded Claims in their entirety from the Claims Register such that a single Surviving Claim will remain on the Claims Register. Notwithstanding the identification of Surviving Claims herein, the Reorganized Debtors reserve all rights to assert further challenges to the validity, amount, and/or priority of the Surviving Claims themselves.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Eighteenth Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Superseded Claim on **Schedule 1** to the Proposed Order as being amended and superseded by a corresponding Surviving Claim filed by the same Claimant. To identify the Superseded Claims, the Reorganized Debtors and their advisors:

(a) reviewed the Claims Register to identify instances in which more than one Claim was submitted by the same Claimant;

(b) assessed the amount, nature, and priority of such Claims based on the information contained in the Proof of Claim form itself as well as any supporting documentation attached thereto;

(c) compared the Claims filed by the same Claimant to determine whether the later-filed Claim was intended to amend or supersede the earlier-filed Claim;

(d) determined that the later-filed Claim did not assert a separate liability from the earlier-filed Claim; and

(e) concluded that the later-filed Claim constitutes an amended Claim that amends and supersedes the earlier-filed Claim and that the Claims should not be treated as separate Claims against the Reorganized Debtors.

16. For each set of Superseded Claims, the Reorganized Debtors hereby request that the Superseded Claim(s) be disallowed and expunged with the Surviving Claims considered Claims against the Reorganized Debtors.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest… objects." 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law . . . ." 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." FED. R. BANKR. P. 3007(d). This includes objections on the grounds that claims should be disallowed because they "have been amended by later proofs of claim." FED. R. BANKR. P. 3007(d)(2)(C).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g.*, *In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim's legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988).

Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, "the ultimate burden of proof always lies with the claimant." *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep't of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Reorganized Debtors dispute that the Superseded Claims assert liabilities separate and apart from those asserted in the later-filed Surviving Claims. Because the Claimants do not assert separate Claims based on distinct underlying obligations, the Surviving Claims should be deemed to amend and supersede the related earlier-filed Superseded Claims, with the Surviving Claims to be addressed by the Reorganized Debtors, which, as noted above, reserve all rights to assert further challenges to the validity, amount, and/or priority of the Surviving Claims themselves, through the claims reconciliation process. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

20. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates (including, without limitation, the Surviving Claims). Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Superseded Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

21. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or

other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

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

23. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at https://www.veritaglobal.net/ModivCare.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: August 18, 2026

Respectfully submitted,

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

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II (Texas Bar No. 24012503)
Jason W. Harbour (Virginia Bar No. 68220)
Brandon Bell (Texas Bar No. 24127019)
600 Travis Street, Suite 4200
Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com
jharbour@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)
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Email: ray.schrock@lw.com
keith.simon@lw.com
george.klidonas@lw.com
jon.weichselbaum@lw.com

Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on August 18, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

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

Exhibit A

Shepard 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)
Reorganized Debtors.[1]	:	(Jointly Administered)

AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS'
EIGHTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Eighteenth Omnibus Objection to Certain Claims* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

2. I am an executive vice president and group chief financial officer for the Reorganized Debtors a role that I have served in for approximately two months. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors' day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Affidavit are based upon my personal knowledge, my review of relevant documents, information provided to me by employees

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

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

working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO SUPERSEDED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Superseded Claims which they seek the disallowance and expungement of so that they may be removed from the Claims Register with the Surviving Claims remaining thereon.

5. The Superseded Claims were identified after the Reorganized Debtors and their advisors:

(a) reviewed the Claims Register to identify instances in which more than one Claim was submitted by the same Claimant;

(b) assessed the amount, nature, and priority of such Claims based on the information contained in the Proof of Claim form itself as well as any supporting documentation attached thereto;

(c) compared the Claims filed by the same Claimant to determine whether the later-filed Claim was intended to amend or supersede the earlier-filed Claim;

(d) determined that the later-filed Claim did not assert a separate liability from the earlier-filed Claim; and

(e) concluded that the later-filed Claim constitutes an amended Claim that amends and supersedes the earlier-filed Claim and that the Claims should not be treated as separate Claims against the Reorganized Debtors.

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.

Dated: August 18, 2026

/s/ Kenneth Shepard
Name: Kenneth Shepard
Title: EVP and Group Chief Financial Officer
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

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 GRANTING REORGANIZED DEBTORS' EIGHTEENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Superseded Claims set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection 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 Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and after due deliberation thereon; and the Court having

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

[2] Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

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

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.

2. Each Superseded Claim listed on **Schedule 1** is disallowed and expunged in its entirety, with the corresponding Surviving Claim remaining on the Claims Register.

3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.

4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.

5. Each Superseded Claim and the Reorganized Debtors' objections to each Superseded Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Superseded Claim.

6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors (including any Surviving Claim); (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim (including any Surviving Claim) on any grounds or basis; or (c) to waive or release

any right, claim, defense, or counterclaim of the Reorganized Debtors, or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

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

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

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

Signed: _____, 2026

_____
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Schedule 1 — Superseded and Amended Claims

#	Claimant Name	Debtor against Whom Claim Was Filed	Superseded Claim No.	Amended/Superseding Claim No.	Asserted Claim Amount Claim Nature	Claim Amount
1	AZALLALI EL IDRISSI, LALLA NABILA	ModivCare Inc.	488	1718	General Unsecured Priority Secured Admin Priority Total	BLANK - - - BLANK
2	BRAR, JASPREET	ModivCare Inc.	158	159	General Unsecured Priority Secured Admin Priority Total	$ 10,000.00 - - - $ 10,000.00
3	BROWNSVILLE INDEPENDENT SCHOOL DISTRICT	Higi SH LLC	190	2054	General Unsecured Priority Secured Admin Priority Total	- - $ 5.09 - $ 5.09
4	CAMERON COUNTY	ModivCare Inc.	619	2180	General Unsecured Priority Secured Admin Priority Total	- - $ 21.54 - $ 21.54
5	CITY OF HOUSTON	Higi SH LLC	24	2188	General Unsecured Priority Secured Admin Priority Total	- - $ 291.86 - $ 291.86
6	CITY OF HOUSTON	Higi SH LLC	1701	2188	General Unsecured Priority Secured Admin Priority Total	- - $ 321.05 - $ 321.05
7	CITY OF MCALLEN	ModivCare Inc.	617	2181	General Unsecured Priority Secured Admin Priority Total	- - $ 23.26 - $ 23.26
8	COMMONWEALTH OF VIRGINIA DEPARTMENT OF TAXATION	Valued Relationships, Inc.	2046	2109	General Unsecured Priority Secured Admin Priority Total	$ 329.67 $ 517.22 - - $ 846.89
9	CYPRESS-FAIRBANKS ISD	Higi SH LLC	25	2189	General Unsecured Priority Secured Admin Priority Total	- - $ 159.62 - $ 159.62
10	DEPARTMENT OF TREASURY - INTERNAL REVENUE SERVICE	ModivCare Inc.	1715	2187	General Unsecured Priority Secured Admin Priority Total	$ 7,947.10 $ 11,973,607.58 - - $ 11,981,554.68

Schedule 1 — Superseded and Amended Claims

#	Claimant Name	Debtor against Whom Claim Was Filed	Superseded Claim No.	Amended/Superseding Claim No.	Asserted Claim Amount Claim Nature	Asserted Claim Amount Claim Amount
11	ELLIS COUNTY	Higi SH LLC	58	2129	General Unsecured Priority Secured Admin Priority Total	- - $ 165.28 - $ 165.28
12	FRANCHISE TAX BOARD	California MedTrans Network IPA LLC	2286	2302	General Unsecured Priority Secured Admin Priority Total	$ 60.00 $ 821.43 - - $ 881.43
13	FRANCHISE TAX BOARD	Higi SH Holdings Inc.	2340	2478	General Unsecured Priority Secured Admin Priority Total	- $ 852.91 - - $ 852.91
14	FRANCHISE TAX BOARD	ModivCare Solutions, LLC	2349	2479	General Unsecured Priority Secured Admin Priority Total	- $ 852.91 - - $ 852.91
15	FRANCHISE TAX BOARD	VRI Intermediate Holdings, LLC	2351	2480	General Unsecured Priority Secured Admin Priority Total	- $ 852.91 - - $ 852.91
16	FRANCHISE TAX BOARD	ModivCare Inc.	2438	2476	General Unsecured Priority Secured Admin Priority Total	$ 3,921.83 $ 31,398.20 - - $ 35,320.03
17	FRANCHISE TAX BOARD	Circulation, Inc.	2439	2477	General Unsecured Priority Secured Admin Priority Total	- $ 852.91 - - $ 852.91
18	FRANCHISE TAX BOARD	Valued Relationships, Inc.	2475	2495	General Unsecured Priority Secured Admin Priority Total	- $ 852.91 - - $ 852.91
19	HARRIS CO ESD # 07	Higi SH LLC	26	2197	General Unsecured Priority Secured Admin Priority Total	- - $ 7.02 - $ 7.02
20	HARRIS CO ESD # 09	Higi SH LLC	27	2198	General Unsecured Priority Secured Admin Priority Total	- - $ 4.32 - $ 4.32

Schedule 1 — Superseded and Amended Claims

#	Claimant Name	Debtor against Whom Claim Was Filed	Superseded Claim No.	Amended/Superseding Claim No.	Claim Nature	Asserted Claim Amount Claim Amount
21	HARRIS CO ESD # 11	Higi SH LLC	28	2199	General Unsecured Priority Secured Admin Priority Total	- - $ 4.85 - $ 4.85
22	HARRIS COUNTY ESD #16	Higi SH LLC	30	2200	General Unsecured Priority Secured Admin Priority Total	- - $ 1.89 - $ 1.89
23	HOUSTON COMM COLL SYSTEM	Higi SH LLC	34	2195	General Unsecured Priority Secured Admin Priority Total	- - $ 42.20 - $ 42.20
24	HOUSTON ISD	Higi SH LLC	35	2191	General Unsecured Priority Secured Admin Priority Total	- - $ 334.85 - $ 334.85
25	JOACHIM-PLATTIN AMBULANCE DISTRICT	ModivCare Inc.	930	1053	General Unsecured Priority Secured Admin Priority Total	$ 151,267.20 - - - $ 151,267.20
26	KATY ISD	Higi SH LLC	38	2194	General Unsecured Priority Secured Admin Priority Total	- - $ 28.15 - $ 28.15
27	LINDER, JONATHAN	ModivCare Inc.	454	814	General Unsecured Priority Secured Admin Priority Total	$ 700.00 - - $ 700.00 $ 1,400.00
28	LONE STAR COLLEGE SYSTEM	Higi SH LLC	39	2196	General Unsecured Priority Secured Admin Priority Total	- - $ 38.83 - $ 38.83
29	MONTGOMERY COUNTY	Higi SH LLC	110	2192	General Unsecured Priority Secured Admin Priority Total	- - $ 226.44 - $ 226.44
30	NORTHEAST TREATMENT CENTERS	ModivCare Inc.	1019	2050	General Unsecured Priority Secured Admin Priority Total	$ 113,627.00 - - - $ 113,627.00

Schedule 1 — Superseded and Amended Claims

#	Claimant Name	Debtor against Whom Claim Was Filed	Superseded Claim No.	Amended/Superseding Claim No.	Asserted Claim Amount Claim Nature	Asserted Claim Amount Claim Amount
31	NUECES COUNTY	ModivCare Inc.	616	2183	General Unsecured Priority Secured Admin Priority Total	- - $ 215.78 - $ 215.78
32	ONEPAK INC	ModivCare Solutions, LLC	439	601	General Unsecured Priority Secured Admin Priority Total	$ 30,429.00 - - $ 15,288.39 $ 45,717.39
33	PACIFIC EAST RESEARCH INC	Valued Relationships, Inc.	669	1891	General Unsecured Priority Secured Admin Priority Total	$ 0.00 - - $ 3,239.49 $ 3,239.49
34	PHI AIR MEDICAL	ModivCare Inc.	787	1206	General Unsecured Priority Secured Admin Priority Total	$ 112,373.38 - - - $ 112,373.38
35	REGER RIZZO & DARNALL, LLP	ModivCare Solutions, LLC	1641	1620	General Unsecured Priority Secured Admin Priority Total	$ 110,906.50 - - - $ 110,906.50
36	REGER RIZZO AND DARNALL, LLP	Care Finders Total Care LLC	1383	1638	General Unsecured Priority Secured Admin Priority Total	$ 4,345.50 - - - $ 4,345.50
37	RUMILL, APRIL	ModivCare Solutions, LLC	432	450	General Unsecured Priority Secured Admin Priority Total	$ 99.60 - - - $ 99.60
38	SKYLINE CLEANING LLC	ModivCare Solutions, LLC	1014	1015	General Unsecured Priority Secured Admin Priority Total	$ 7,403.23 - - - $ 7,403.23
39	TEXAS COMPTROLLER OF PUBLIC ACCOUNTS	ModivCare Inc.	2121	2173	General Unsecured Priority Secured Admin Priority Total	$ 12,495.91 $ 239,824.53 - - $ 252,320.44
40	WINNER, ANDREW RICHARD	ModivCare Solutions, LLC	52	53	General Unsecured Priority Secured Admin Priority Total	$ 575,219.32 - - - $ 575,219.32