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' TWENTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION 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 the claims listed on **Schedule 1** to the Proposed Order (the "***Insufficient Documentation Claims***") in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any amount owed on account of each such Insufficient Documentation Claim.

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 Insufficient Documentation Claim that is the subject of this Objection was asserted on a proof of claim form (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 Debtors' estates based on the filing of a Proof of Claim, the holders of the Insufficient

[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.

Documentation 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.

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*

[3] Docket No. 1055.

Thereof; and (C) Granting Related Relief [Docket No. 66] (the "***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 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." Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the 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 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

[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]; (ix) *Supplemental Certificate of Service* [Docket No. 727]; (x) *Supplemental Certificate of Service* [Docket No. 1067]; (xi) *Supplemental Certificate of Service* [Docket No. 1127]; (xii) *Supplemental Certificate of Service* [Docket No. 1143]; (xiii) *Supplemental Certificate of Service*

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

[Docket No. 1148]; (xiv) *Supplemental Certificate of Service* [Docket No. 1184]; (xv) *Supplemental Certificate of Service* [Docket No. 1285]; and (xvi) *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.").

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, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE INSUFFICIENT DOCUMENTATION CLAIMS

14. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms allowed them to identify the Insufficient Documentation Claims. This Objection seeks to disallow and expunge the Insufficient Documentation Claims in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of each such Insufficient Documentation Claim.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Twenty-Second Omnibus Objection to Certain Claims*, to be attached hereto as **Exhibit A**, based on their review of the Claims Register and applicable Claim Forms, the Reorganized Debtors and their advisors identified each Insufficient Documentation Claim listed on **Schedule 1** to the Proposed Order as failing to provide documentation sufficient to substantiate the asserted liability or amount. To identify the Insufficient Documentation Claims, the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in

certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any amount owed on account of each Insufficient Documentation Claim.

16. The Reorganized Debtors hereby request that the Insufficient Documentation Claims be disallowed in their entirety and expunged.

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 "were presented in a form that does not comply with applicable rules and the objection states that the objector is therefore unable to determine a claim's validity . . . ." FED. R. BANKR. P. 3007(d)(2)(F).

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 Bar Date Order expressly provides that 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." Bar Date Order, ¶ 7. As set forth above, each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount. To the extent a Claimant included a statement concerning the absence or unavailability of supporting documentation, such statement does not, standing alone, substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim. Furthermore, based on the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of the Insufficient Documentation Claims. Thus, the Insufficient Documentation Claims are subject to disallowance.

20. 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

21. 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. 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 Insufficient Documentation Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. 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

23. 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.

24. 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: September 24, 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 September 24, 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 Affidavit

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'
TWENTY-SECOND 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' Twenty-Second 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. 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 INSUFFICIENT DOCUMENTATION 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 Insufficient Documentation Claims which they seek the disallowance of in their entirety.

5. The Insufficient Documentation Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any amount owed on account of each Insufficient Documentation Claim.

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.

[*Remainder of page intentionally left blank.*]

Dated: September 24, 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' TWENTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS
[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 Insufficient Documentation Claims in their entirety as 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

[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 defined herein have the meanings ascribed to them in the Objection.

deliberation thereon; and the Court having 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 Insufficient Documentation Claim listed on **Schedule 1** is disallowed and expunged in its entirety.

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

6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Insufficient Documentation Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any 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

INSUFFICIENT DOCUMENTATION CLAIMS

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	ASBURY, MICHAEL	ModivCare Inc.	643	09-23-25	General Unsecured Priority Secured Admin Priority Total	$228.00 $0.00 $0.00 $0.00 $228.00
2	AUSTIN, MARY	Ride Plus, LLC	219	09-13-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $1,000.00 $0.00 $0.00 $1,000.00
3	BATISTA DE MINAYA, SOTERA	Care Finders Total Care LLC	155	09-10-25	General Unsecured Priority Secured Admin Priority Total	$3,200.00 $0.00 $0.00 $0.00 $3,200.00
4	BENSON, QUEEN	ModivCare Solutions, LLC	970	09-29-25	General Unsecured Priority Secured Admin Priority Total	$2,415.00 $0.00 $0.00 $0.00 $2,415.00
5	BEWLEY, LINDA	ModivCare Inc.	813	09-26-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $2,000.00 $0.00 $0.00 $2,000.00
6	BLAKELY, JERMAINE	ModivCare Inc.	186	09-11-25	General Unsecured Priority Secured Admin Priority Total	$100.00 $0.00 $0.00 $0.00 $100.00
7	BONAMOU, ANGELINE	ModivCare Inc.	242	09-15-25	General Unsecured Priority Secured Admin Priority Total	$1,500.00 $0.00 $0.00 $0.00 $1,500.00
8	BRADLEY, CLINTON	ModivCare Solutions, LLC	1089	09-30-25	General Unsecured Priority Secured Admin Priority Total	$3,120.00 $0.00 $0.00 $0.00 $3,120.00
9	BURGESS, EDWARD	ModivCare Inc.	238	09-15-25	General Unsecured Priority Secured Admin Priority Total	$300.00 $0.00 $0.00 $0.00 $300.00
10	CAGE, EARL	ModivCare Inc.	340	09-16-25	General Unsecured Priority Secured Admin Priority Total	$13,400.00 $0.00 $0.00 $0.00 $13,400.00
11	CAMPOS, JOELEEN	ModivCare Inc.	956	09-29-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $3,800.00 $0.00 $0.00 $3,800.00
12	CAPERS, HERMAN	ModivCare Inc.	453	09-18-25	General Unsecured Priority Secured Admin Priority Total	$116.00 $0.00 $0.00 $0.00 $116.00
13	CASTLE, RIAN N	ModivCare Inc.	203	09-12-25	General Unsecured Priority Secured Admin Priority Total	$78.00 $0.00 $0.00 $0.00 $78.00
14	CHEREMOND, MARIETTE	ModivCare Inc.	574	09-22-25	General Unsecured Priority Secured Admin Priority Total	$73,640.14 $0.00 $0.00 $0.00 $73,640.14
15	CHLOE, JASON	ModivCare Inc.	1417	10-01-25	General Unsecured Priority Secured Admin Priority Total	$1,000.00 $0.00 $0.00 $0.00 $1,000.00
16	CLANTON, MAYA	ModivCare Inc.	893	09-28-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $15,000.00 $0.00 $0.00 $15,000.00
17	CLARK, LOUISE	ModivCare Inc.	501	09-20-25	General Unsecured Priority Secured Admin Priority Total	$300.00 $0.00 $0.00 $0.00 $300.00
18	COLLINS, PATRICK	ModivCare Solutions, LLC	216	09-13-25	General Unsecured Priority Secured Admin Priority Total	$150.00 $0.00 $0.00 $0.00 $150.00
19	CURTIS, ELGIA MAE	ModivCare Inc.	1077	09-30-25	General Unsecured Priority Secured Admin Priority Total	$149.00 $0.00 $0.00 $0.00 $149.00
20	DANIELS, RACHEAL	ModivCare Inc.	246	09-14-25	General Unsecured Priority Secured Admin Priority Total	$250.00 $0.00 $0.00 $0.00 $250.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
21	DAVIS, AUDRI	ModivCare Solutions, LLC	1084	09-30-25	General Unsecured Priority Secured Admin Priority Total	$1,000.00 $0.00 $0.00 $1,500.00 $2,500.00
22	DENDY, STEVEN JR.	ModivCare Solutions, LLC	224	09-13-25	General Unsecured Priority Secured Admin Priority Total	$100.00 $0.00 $0.00 $0.00 $100.00
23	DIPON, BENJAMIN BRYAN	ModivCare Inc.	1082	09-30-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $10,000.00 $0.00 $10,000.00 $20,000.00
24	DIPON, ESTELITA	ModivCare Inc.	1420	09-30-25	General Unsecured Priority Secured Admin Priority Total	$5,000.00 $5,000.00 $0.00 $0.00 $10,000.00
25	DOBBINS, WILLIAM	ModivCare Solutions, LLC	499	09-20-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $300.00 $300.00
26	DONALD, BRENDA	ModivCare Inc.	1336	09-30-25	General Unsecured Priority Secured Admin Priority Total	$120.00 $0.00 $0.00 $0.00 $120.00
27	ETCITTY, SUZANNA A	ModivCare Inc.	116	09-09-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $152.00 $152.00
28	FINCHAM, WAYNE	ModivCare Inc.	1331	09-30-25	General Unsecured Priority Secured Admin Priority Total	- - - - $ -
29	FOSTER, CHRIS	ModivCare Inc.	447	09-17-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $4,077.20 $0.00 $0.00 $4,077.20
30	Futurinvest Gestion SL	ModivCare Inc.	779	09-25-25	General Unsecured Priority Secured Admin Priority Total	$500,000.00 $0.00 $0.00 $0.00 $500,000.00
31	GARCIA, JOE	ModivCare Inc.	184	09-11-25	General Unsecured Priority Secured Admin Priority Total	$1,000.00 $0.00 $0.00 $0.00 $1,000.00
32	GINAUD, JEAN L	ModivCare Inc.	657	09-23-25	General Unsecured Priority Secured Admin Priority Total	$11,516.14 $0.00 $0.00 $0.00 $11,516.14
33	GLASURE, JOSHUA	ModivCare Solutions, LLC	448	09-18-25	General Unsecured Priority Secured Admin Priority Total	$1,179.00 $0.00 $0.00 $0.00 $1,179.00
34	GRANT, SHANEQUA	ModivCare Inc.	269	09-15-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $1,600.00 $1,600.00
35	GREEN, TAMMY	ModivCare Inc.	421	09-17-25	General Unsecured Priority Secured Admin Priority Total	$150,800.00 $0.00 $0.00 $0.00 $150,800.00
36	GRIMMETT, MICHAEL	ModivCare Inc.	546	09-22-25	General Unsecured Priority Secured Admin Priority Total	$3,000.00 $0.00 $0.00 $0.00 $3,000.00
37	HARMON, MARINA D	ModivCare Inc.	358	09-16-25	General Unsecured Priority Secured Admin Priority Total	$107.00 $0.00 $0.00 $0.00 $107.00
38	HARRIS, ANTHONY	ModivCare Inc.	705	09-24-25	General Unsecured Priority Secured Admin Priority Total	$3,800.00 $0.00 $0.00 $0.00 $3,800.00
39	HARRIS, THOMAS I	ModivCare Inc.	1349	09-30-25	General Unsecured Priority Secured Admin Priority Total	$10,000.00 $0.00 $0.00 $0.00 $10,000.00
40	HATFIELD, SAMANTHA	ModivCare Solutions, LLC	181	09-11-25	General Unsecured Priority Secured Admin Priority Total	$1,000.00 $0.00 $0.00 $0.00 $1,000.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
41	HEDDEN, TAMI	ModivCare Solutions, LLC	306	09-16-25	General Unsecured Priority Secured Admin Priority Total	$750.00 $0.00 $0.00 $0.00 $750.00
42	HENRY, JANE	ModivCare Inc.	895	09-29-25	General Unsecured Priority Secured Admin Priority Total	$200.00 $0.00 $0.00 $0.00 $200.00
43	HILL, JESSICA	ModivCare Solutions, LLC	301	09-16-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $2,000.00 $1,000.00 $0.00 $3,000.00
44	HINES, CHERYL	ModivCare Inc.	1000	09-29-25	General Unsecured Priority Secured Admin Priority Total	$95.00 $0.00 $0.00 $0.00 $95.00
45	HINTON, JAMILA	ModivCare Inc.	614	09-22-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $2,000.00 $0.00 $0.00 $2,000.00
46	HORTON, LATIA	ModivCare Inc.	295	09-13-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $43,000.00 $70,000.00 $10,000.00 $123,000.00
47	HOWER, WILLIAM ELLIS	ModivCare Inc.	300	09-16-25	General Unsecured Priority Secured Admin Priority Total	$1,193.00 $0.00 $0.00 $0.00 $1,193.00
48	HUTCHINSON, MATTHEW W	ModivCare Inc.	1281	09-30-25	General Unsecured Priority Secured Admin Priority Total	$218.00 $0.00 $0.00 $0.00 $218.00
49	JACK, DAWN	ModivCare Inc.	1445	10-01-25	General Unsecured Priority Secured Admin Priority Total	$2,015.00 $0.00 $0.00 $0.00 $2,015.00
50	JACKSON, CARRIE	ModivCare Solutions, LLC	606	09-23-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $900.00 $0.00 $0.00 $900.00
51	JAMES, MARISSA	ModivCare Solutions, LLC	1008	09-29-25	General Unsecured Priority Secured Admin Priority Total	$352.80 $0.00 $0.00 $0.00 $352.80
52	JARVIS, SELENA	ModivCare Inc.	733	09-24-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $150.00 $0.00 $0.00 $150.00
53	JENKINS, VERITA	ModivCare Solutions, LLC	405	09-18-25	General Unsecured Priority Secured Admin Priority Total	$850.00 $0.00 $0.00 $0.00 $850.00
54	JOHNSON, BRITTANY	ModivCare Solutions, LLC	1242	09-30-25	General Unsecured Priority Secured Admin Priority Total	$600.00 $0.00 $0.00 $0.00 $600.00
55	JOHNSON, SHANYECIA	ModivCare Inc.	645	09-23-25	General Unsecured Priority Secured Admin Priority Total	$17,150.00 $0.00 $0.00 $0.00 $17,150.00
56	JONES, DARRYL GLENN	ModivCare Inc.	954	09-29-25	General Unsecured Priority Secured Admin Priority Total	$4,210.00 $3,800.00 $0.00 $0.00 $8,010.00
57	JONES, LORI EVADNEY	ModivCare Solutions, LLC	288	09-15-25	General Unsecured Priority Secured Admin Priority Total	$22,000.00 $0.00 $0.00 $0.00 $22,000.00
58	JOSEPH, BEHALMAY	ModivCare Inc.	737	09-24-25	General Unsecured Priority Secured Admin Priority Total	$310,000.00 $0.00 $310,000.00 $0.00 $620,000.00
59	JOW, ALICE	ModivCare Solutions, LLC	92	09-08-25	General Unsecured Priority Secured Admin Priority Total	$525.00 $0.00 $0.00 $0.00 $525.00
60	KEENER, ANASTASIA	ModivCare Inc.	234	09-13-25	General Unsecured Priority Secured Admin Priority Total	$2,064.00 $0.00 $0.00 $0.00 $2,064.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
61	KELLIHAN, KATHERINE	ModivCare Inc.	538	09-19-25	General Unsecured Priority Secured Admin Priority Total	$1,500.00 $0.00 $0.00 $0.00 $1,500.00
62	KING, DONALD	Helping Hand Home Health Care Agency Inc	821	09-25-25	General Unsecured Priority Secured Admin Priority Total	$500.00 $0.00 $0.00 $0.00 $500.00
63	KINNISON, KIM	ModivCare Inc.	525	09-20-25	General Unsecured Priority Secured Admin Priority Total	$312.90 $0.00 $0.00 $0.00 $312.90
64	LACY, JOHN	ModivCare Solutions, LLC	1032	09-29-25	General Unsecured Priority Secured Admin Priority Total	$26,356.00 $0.00 $0.00 $0.00 $26,356.00
65	LAFKO, HANNA E	ModivCare Solutions, LLC	243	09-14-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $702.00 $0.00 $0.00 $702.00
66	LAURINCE, JUBENS	All Metro Aids Inc.	1669	10-01-25	General Unsecured Priority Secured Admin Priority Total	$10,000.00 $0.00 $0.00 $0.00 $10,000.00
67	LEMON, LINDA POSTELL	ModivCare Solutions, LLC	475	09-19-25	General Unsecured Priority Secured Admin Priority Total	$10.00 $0.00 $0.00 $0.00 $10.00
68	LEWIS, TRAVIS	ModivCare Inc.	205	09-13-25	General Unsecured Priority Secured Admin Priority Total	$3,800.00 $0.00 $0.00 $0.00 $3,800.00
69	LONG, JUDD	ModivCare Inc.	961	09-29-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $723.60 $723.60
70	LUVENE, JAVON	ModivCare Inc.	252	09-14-25	General Unsecured Priority Secured Admin Priority Total	$30,000.00 $0.00 $0.00 $0.00 $30,000.00
71	LYNCH, MARCIA	ModivCare Inc.	160	09-11-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $13,800.00 $2,000.00 $10,000.00 $25,800.00
72	MACIE, STEVEN	ModivCare Inc.	270	09-15-25	General Unsecured Priority Secured Admin Priority Total	$200.00 $0.00 $0.00 $0.00 $200.00
73	MAESTAS, FREDDY ANTHONY	ModivCare Inc.	625	09-22-25	General Unsecured Priority Secured Admin Priority Total	$168.00 $5,000.00 $0.00 $0.00 $5,168.00
74	MAKI, AMBER LYNN	ModivCare Inc.	530	09-22-25	General Unsecured Priority Secured Admin Priority Total	$200.00 $0.00 $0.00 $0.00 $200.00
75	MALONE, TANIESHA	ModivCare Solutions, LLC	277	09-15-25	General Unsecured Priority Secured Admin Priority Total	$50,000.00 $0.00 $0.00 $0.00 $50,000.00
76	MANZO, LUIS	ModivCare Solutions, LLC	1270	09-30-25	General Unsecured Priority Secured Admin Priority Total	$1,750.00 $0.00 $0.00 $0.00 $1,750.00
77	MARTIN, CYNTHIA	ModivCare Inc.	799	09-26-25	General Unsecured Priority Secured Admin Priority Total	$7,350.00 $6,800.00 $0.00 $6,800.00 $20,950.00
78	MATARIYEH, REEMA	ModivCare Solutions, LLC	217	09-15-25	General Unsecured Priority Secured Admin Priority Total	$100.00 $0.00 $0.00 $0.00 $100.00
79	MCCOY, JOSEPH	ModivCare Inc.	732	09-24-25	General Unsecured Priority Secured Admin Priority Total	$1,271.00 $0.00 $0.00 $0.00 $1,271.00
80	MCCRAY, TONYA	A.E. Medical Alert, Inc.	1529	10-01-25	General Unsecured Priority Secured Admin Priority Total	$10,000.00 $0.00 $0.00 $0.00 $10,000.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
81	MCDANIELS CAMP, HELEN	ModivCare Inc.	615	09-19-25	General Unsecured Priority Secured Admin Priority Total	$125.00 $0.00 $0.00 $0.00 $125.00
82	MCKENZIE, CECIL D	ModivCare Inc.	684	09-23-25	General Unsecured Priority Secured Admin Priority Total	$5,000.00 $0.00 $0.00 $0.00 $5,000.00
83	MESSER, NASHELL	ModivCare Solutions, LLC	818	09-26-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $1,000.00 $0.00 $1,000.00 $2,000.00
84	MOLERES, MICHELLE	ModivCare Inc.	1414	10-01-25	General Unsecured Priority Secured Admin Priority Total	$500.00 $0.00 $0.00 $0.00 $500.00
85	MOORE, REBEKAH	ModivCare Solutions, LLC	1048	09-30-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $17,150.00 $0.00 $0.00 $17,150.00
86	OMOTADE, MUNIRAH	ModivCare Inc.	1274	09-30-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $3,860.00 $0.00 $0.00 $3,860.00
87	OUELLETTE, JERRY	ModivCare Inc.	240	09-15-25	General Unsecured Priority Secured Admin Priority Total	$9.80 $0.00 $0.00 $0.00 $9.80
88	PELSINSKI, MEGAN	ModivCare Inc.	308	09-16-25	General Unsecured Priority Secured Admin Priority Total	$2,000.00 $0.00 $0.00 $0.00 $2,000.00
89	PFEFFER, RACHEL MARIE	ModivCare Inc.	497	09-19-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $500.00 $0.00 $0.00 $500.00
90	PRYOR, DAVID M	ModivCare Solutions, LLC	759	09-25-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $160.00 $160.00
91	PYLE, MARTHA	ModivCare Inc.	1681	10-01-25	General Unsecured Priority Secured Admin Priority Total	$5,000.00 $0.00 $0.00 $0.00 $5,000.00
92	RAMIREZ, ROGELIO	ModivCare Inc.	493	09-19-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $3,800.00 $4,000.00 $0.00 $7,800.00
93	RAMM, MELISSA	Guardian Medical Monitoring, LLC	407	09-17-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $1,920.00 $1,920.00
94	REICHBACH, JERRY	ModivCare Inc.	847	09-26-25	General Unsecured Priority Secured Admin Priority Total	$1,000.00 $0.00 $0.00 $0.00 $1,000.00
95	RELPH, CHERIE	ModivCare Solutions, LLC	527	09-21-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $75.00 $75.00
96	Ricoh-USA, Inc.	ModivCare Inc.	1482	10-01-25	General Unsecured Priority Secured Admin Priority Total	$295.16 $0.00 $0.00 $0.00 $295.16
97	ROBERSON, TURNELL R	ModivCare Inc.	1285	09-30-25	General Unsecured Priority Secured Admin Priority Total	$800.00 $0.00 $0.00 $0.00 $800.00
98	ROBINSON, LATRON	ModivCare Inc.	276	09-15-25	General Unsecured Priority Secured Admin Priority Total	$2,000.00 $0.00 $0.00 $0.00 $2,000.00
99	ROSAS, SANDRA	ModivCare Inc.	498	09-20-25	General Unsecured Priority Secured Admin Priority Total	$305,832.66 $0.00 $0.00 $0.00 $305,832.66
100	SALTER, NIKINA	ModivCare Solutions, LLC	597	09-22-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $600.00 $0.00 $0.00 $600.00