Docket #1776 Date Filed: 09/24/2026

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

REORGANIZED DEBTORS' TWENTY-FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID 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.

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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 (a) the claims listed on **Schedule 1** to the Proposed Order because such claims are inconsistent with the Reorganized Debtors' books and records (the "***Books and Records Claims***"), (b) the claims listed on **Schedule 2** to the Proposed Order because such claims seek recovery on account of Existing Parent Equity Interests which were extinguished pursuant to the Plan or the Confirmation Order (the "***Plan Claims***"), (c) the claims listed on **Schedule 3** to the Proposed Order because such claims fail to sufficiently specify the legal or factual basis for the asserted liability (the "***Insufficient Basis Claims***"), and (d) the claim listed on **Schedule 4** to the Proposed Order because such claim seeks recovery of amounts for which the Reorganized Debtors are not liable (the "***No Liability Claim***" and together with the Books and Records Claims, the Plan Claims, and the Insufficient Basis Claims, collectively, the "***Disputed Claims***").

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.

[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.

3. Each Disputed 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 Disputed 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 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***"),

[3] Docket No. 1055.

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 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

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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]; (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* [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.").

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 Disputed Claims along with this Objection.

13. Among other things, the Omnibus Objection Procedures Order authorizes the Reorganized Debtors to file omnibus objections on account of any of the Additional Grounds (as defined in the Omnibus Objection Procedures Order). The Additional Grounds, include, *inter alia*, Claims that: (i) "are inconsistent with the Reorganized Debtors' books and records"; (ii) "seek recovery of amounts for which the Reorganized Debtors are not liable"; (iii) "fail to sufficiently specify the basis for the Claim …"; and (iv) "are disallowed pursuant, or … are otherwise inconsistent with, the Plan or the Confirmation Order." Omnibus Objection Procedures Order, ¶ 1(a), (c), (h)-(i).

14. Pursuant to the Plan, the Claims Objection Deadline was initially March 29, 2026 (*i.e.*, the date that was ninety (90) days after the occurrence of the Effective Date), subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.[7]

15. 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.

[7] *See* Plan, p. 3 (defining "Claims Objection Deadline" as "ninety (90) days after the Effective Date … which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.").

THE DISPUTED CLAIMS

16. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms, their books and records, and the Plan and Confirmation Order allowed them to identify the Disputed Claims, which fall into the four categories described below.

- **Books and Record Claims:** The Claims listed on **Schedule 1** to the Proposed Order are the Books and Records Claims. Each Books and Records Claim is inconsistent with the Reorganized Debtors' books and records, which reflect that no amount is owed on account of each such Claim.

- **Plan Claims:** The Claims listed on **Schedule 2** to the Proposed Order are the Plan Claims. Each Plan Claim seeks recovery on account of an Existing Parent Equity Interest and pursuant to the terms of the Plan each such Claim was cancelled and extinguished.

- **Insufficient Basis Claims**: The Claims listed on **Schedule 3** to the Proposed Order are the Insufficient Basis Claims. Each Insufficient Basis Claim fails to identify with sufficient specificity the legal or factual basis for the asserted liability and does not provide sufficient information for the Reorganized Debtors to determine the nature or basis of the alleged obligation.

- **No Liability Claim**: The Claim listed on **Schedule 4** to the Proposed Order is the No Liability Claim. The No Liability Claim seeks recovery of amounts for which the Reorganized Debtors are not liable.

17. Consistent with the Objection Procedures, each Schedule includes only Claims subject to a common basis for objection. To the extent a Claim is subject to more than one basis for objection, the Claim will be listed on each applicable Schedule. Each Schedule identifies the section of this Objection addressing the applicable ground. *See* Objection Procedures ¶ 4.

18. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Twenty-fifth 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 Disputed Claims after they:

(a) reviewed the Claims Register and applicable Claim Forms, including any attachments, to determine the asserted amount, classification, and stated basis for each Claim;

(b) compared the Claims with the Reorganized Debtors' books and records and determined, based on such review, that the Books and Records Claims are inconsistent with the Reorganized Debtors' books and records;

(c) based on the advice of the Reorganized Debtors' advisors, including counsel, determined that the Plan Claims are disallowed under the Plan and/or the Confirmation Order;

(d) reviewed the information included in or with each Claim Form and determined that each of the Insufficient Basis Claims fail to sufficiently specify the legal or factual basis for the asserted liability; and

(e) reviewed the No Liability Claim and determined that that the No Liability Claim seeks recovery of amounts for which the Reorganized Debtors are not liable.

19. Accordingly, the Reorganized Debtors hereby request that the Disputed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

20. 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).

21. Bankruptcy Rule 3007 provides certain grounds upon which objections to more than one claim may be joined in a single objection, and Bankruptcy Rule 3007(c) permits the Court to authorize omnibus objections on additional grounds. The Objection Procedures expressly authorize the Reorganized Debtors to file omnibus objections to Claims that are inconsistent with the Reorganized Debtors' books and records, seek recovery of amounts for which the Reorganized Debtors are not liable, are disallowed pursuant to the Plan or the Confirmation Order, or fail to sufficiently specify the basis for the Claim. *See* Objection Procedures ¶¶ 1(a), (c), (h)-(i).

22. 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)).

23. For the reasons set forth below the Disputed Claims should be disallowed and expunged in their entirety.

I. The Books and Records Claims Should Be Disallowed Because They Are Inconsistent with the Reorganized Debtors' Books and Records.

24. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file omnibus objections to Claims that "are inconsistent with the Reorganized Debtors' books and records." Omnibus Objection Procedures Order, ¶ 1(a). Each of the Books and Records Claims assert liabilities or amounts that are inconsistent with the Reorganized Debtors' books and records. More specifically, based on the Reorganized Debtors' books and records the Reorganized Debtors do not owe any amount on account of the Books and Records Claims.

25. Accordingly, the Books and Records Claims should be disallowed and expunged in their entirety.

II. The Plan Claims Should Be Disallowed Pursuant to the Plan and Confirmation Order.

26. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file omnibus objections to Claims that "are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order." *Id.* at ¶ 1(i). Each of the Plan Claims embodies a Claim on account of an Existing Parent Equity Interest. Pursuant to the Plan, Holders of Existing Parent Equity Interests "shall not receive or retain any distribution, property or value on account of such Existing Parent Equity Interest[,]" and all such interests were "canceled, released, extinguished, and of no further force and effect." Plan, Art. IV, § 4.9.

27. Accordingly, each of the Plan Claims should be disallowed and expunged in their entirety as such Claims were disallowed under and/or inconsistent with the terms of the Plan.

III. The Insufficient Basis Claims Should Be Disallowed Because They Fail to Sufficiently Specify the Legal and Factual Basis for the Asserted Liability.

28. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file omnibus objections to Claims that "fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor". Omnibus Objection Procedures Order, ¶ 1(h). Moreover, the Bar Date Order requires each filed claim to "set forth with specificity the legal and factual basis for the alleged claim" and to "include supporting documentation or an explanation as to why such documentation is not available." Bar Date Order, ¶ 7. These requirements mirror the obligations imposed by Bankruptcy Rule 3001, which conditions a claim's prima facie validity on the claimant's provision of sufficient information and documentation to substantiate the claim. Claims filed without the requisite factual detail fail to comply with the Bar Date Order and do not attain prima facie evidentiary status under Bankruptcy Rule 3001(f).

29. Each Insufficient Basis Claim fails to identify with sufficient specificity the transaction, agreement, service, event, or other basis for the obligation on account of which such Claimants assert a Claim. The Insufficient Basis Claims do not contain this necessary information and the Reorganized Debtors do not believe any amounts are owed on account of the Insufficient Basis Claims.

30. Accordingly, the Insufficient Basis Claims should be disallowed and expunged in their entirety.

IV. The No Liability Claim Should be Disallowed Because the Reorganized Debtors Are Not Liable for the No Liability Claim.

31. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file omnibus objections to Claims that "fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor". Omnibus Objection Procedures Order, ¶ 1(h). The No Liability Claim asserts that it is based on a purported "Netflix overcharge", and includes, as an exhibit to the Claim Form, a letter further detailing the basis of the No Liability as attributable to alleged overcharges from the streaming service. The Reorganized Debtors have no liability for such Claim.

32. Accordingly, the No Liability Claim should be disallowed and expunged in its entirety.

RESERVATION OF RIGHTS

33. 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 Disputed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

34. 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

35. 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.

36. 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

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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-FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Twenty-Fifth Omnibus Objection to Certain Claims (Invalid 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 DISPUTED 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 the Disputed Claims which they seek the disallowance of in their entirety.

5. The Disputed Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register and the applicable Claim Forms, including any attachments, to determine the asserted amount, classification, and stated basis for each Claim;

(b) compared the Claims with the Reorganized Debtors' books and records and determined, based on such review, that the Books and Records Claims are inconsistent with the Reorganized Debtors' books and records;

(c) determined, based on the advice of the Reorganized Debtors' advisors, including counsel, that the Plan Claims are disallowed under the Plan and/or the Confirmation Order;

(d) reviewed the information included in or with each Claim Form and determined that each of the Insufficient Basis Claims fail to sufficiently specify the legal or factual basis for the asserted liability; and

(e) reviewed the No Liability Claim and determined that that the No Liability Claim seeks recovery of amounts for which the Reorganized Debtors are not liable.

[*Remainder of page intentionally left blank.*]

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: 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-FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID 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 Books and Records Claims set forth on **Schedule 1** hereto, the Plan Claims set forth on **Schedule 2** hereto, the Insufficient Basis Claims set forth on **Schedule 3**, and the No Liability Claim set forth on **Schedule 4** hereto (collectively, the "***Disputed Claims***"), in their entirety 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

[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.

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 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 of the Books and Records Claim listed on **Schedule 1** is disallowed and expunged in its entirety.

3. Each of the Plan Claims listed on **Schedule 2** is disallowed and expunged in its entirety.

4. Each of the Insufficient Basis Claims listed on **Schedule 3** is disallowed and expunged in its entirety.

5. The No Liability Claim listed on **Schedule 4** is disallowed and expunged in its entirety.

6. 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.

7. 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.

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

9. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Disputed 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).

10. 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.

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

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

13. 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

(BOOKS AND RECORDS CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	Alachua County Fire/Rescue	ModivCare Inc.	2159	12/03/2025	General Unsecured	$14,232.77
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$14,232.77
2	B and S Properties	ModivCare Inc.	1846	10/08/2025	General Unsecured	$14,911.50
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$14,911.50
3	Carton, Emanuel	ModivCare Inc.	1553	10/01/2025	General Unsecured	$1,607.20
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,607.20
4	Chavez, Antonio	ModivCare Solutions, LLC	624	09/21/2025	General Unsecured	$1,275.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,275.00
5	Collins, Shelia Renee	ModivCare Inc.	1328	09/30/2025	General Unsecured	$1,780.10
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,780.10
6	Falck Mobile Health Corp	ModivCare Inc.	1147	09/30/2025	General Unsecured	$103,102.67
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$103,102.67
7	Ferro, Victoria	ModivCare Inc.	139	09/10/2025	General Unsecured	$4,415.58
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$4,415.58
8	JOACHIM-PLATTIN AMBULANCE DISTRICT	ModivCare Solutions, LLC	1053	09/29/2025	General Unsecured	$151,267.20
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$151,267.20
9	Skelly, Cheryl	ModivCare Inc.	1667	10/01/2025	General Unsecured	$1,523.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,523.00
10	St Amand, Jason Jon douglas St	ModivCare Inc.	986	09/29/2025	General Unsecured	$9,541.63
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$9,541.63
11	St Amand, Jayson	ModivCare Inc.	979	09/29/2025	General Unsecured	$9,541.63
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$9,541.63

Schedule 2

(PLAN AND CONFIRMATION ORDER CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	BAHR, ALISON M	ModivCare Inc.	637	9/23/2025	General Unsecured Priority Secured Admin Priority Total	$5,000.00 $0.00 $0.00 $0.00 $5,000.00
2	BALIAN, STEVEN M.	ModivCare Inc.	64	9/5/2025	General Unsecured Priority Secured Admin Priority Total	$20,803.00 $0.00 $0.00 $0.00 $20,803.00
3	BAUER, MICHAEL	ModivCare Inc.	63	9/4/2025	General Unsecured Priority Secured Admin Priority Total	$14,740.00 $0.00 $0.00 $0.00 $14,740.00
4	CROWELL, DYLAN	ModivCare Inc.	1555	10/1/2025	General Unsecured Priority Secured Admin Priority Total	$27,690.00 $0.00 $0.00 $0.00 $27,690.00
5	GREEN, BRIAN JAMAR	ModivCare Inc.	596	9/22/2025	General Unsecured Priority Secured Admin Priority Total	$4,461,439.83 $7,500.00 $0.00 $0.00 $4,468,939.83
6	LEE, KIN	ModivCare Inc.	790	9/25/2025	General Unsecured Priority Secured Admin Priority Total	$5,077.00 $0.00 $0.00 $0.00 $5,077.00
7	LIPINSKI, RYAN	ModivCare Inc.	346	9/17/2025	General Unsecured Priority Secured Admin Priority Total	$135.00 $0.00 $0.00 $0.00 $135.00
8	MIAH, FAIZAH-BEGUM	ModivCare Inc.	1321	9/30/2025	General Unsecured Priority Secured Admin Priority Total	$97.86 $0.00 $0.00 $0.00 $97.86
9	MORTON, JENNIFER L	ModivCare Inc.	740	9/24/2025	General Unsecured Priority Secured Admin Priority Total	$12.58 $0.00 $0.00 $0.00 $12.58
10	MOYA, SERGIO LIZASOAIN	ModivCare Inc.	49	9/2/2025	General Unsecured Priority Secured Admin Priority Total	$483.31 $0.00 $0.00 $0.00 $483.31
11	RUMAGE, MICHAEL J.	ModivCare Inc.	174	9/12/2025	General Unsecured Priority Secured Admin Priority Total	$6,475.00 $0.00 $0.00 $0.00 $6,475.00
12	RUMAGE, MICHAEL J.	ModivCare Solutions, LLC	194	9/12/2025	General Unsecured Priority Secured Admin Priority Total	$4,810.00 $0.00 $0.00 $0.00 $4,810.00
13	TYSON, CARMAN	ModivCare Solutions, LLC	594	9/23/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $323.42 $323.42
14	WARREN, MARK R	ModivCare Inc.	113	9/10/2025	General Unsecured Priority Secured Admin Priority Total	$191,160.00 $0.00 $0.00 $0.00 $191,160.00
15	YANG, MI	ModivCare Inc.	62	9/4/2025	General Unsecured Priority Secured Admin Priority Total	$3,000.00 $0.00 $0.00 $0.00 $3,000.00

Schedule 3

(INSUFFICIENT BASIS CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	AVELLI, STEVEN	ModivCare Inc.	473	9/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - - $ -
2	BRAR, JASPREET	ModivCare Inc.	159	9/11/2025	General Unsecured Priority Secured Admin Priority Total	$28,000.00 $0.00 $0.00 $0.00 $28,000.00
3	BUSBY, LATONYA	ModivCare Solutions, LLC	1043	9/30/2025	General Unsecured Priority Secured Admin Priority Total	$12,000.00 $0.00 $0.00 $0.00 $12,000.00
4	COLYER, JOYCE	ModivCare Inc.	299	9/16/2025	General Unsecured Priority Secured Admin Priority Total	$10,000.00 $0.00 $0.00 $0.00 $10,000.00
5	DO, DONALD THANH	ModivCare Inc.	513	9/21/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $17,150.00 $0.00 $0.00 $17,150.00
6	ELLIS, JENINE	ModivCare Inc.	471	9/19/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $5,000.00 $0.00 $0.00 $5,000.00
7	FIBER, CHARLES J	ModivCare Inc.	738	9/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - - $ -
8	HAMMOND, SHERRIE S	ModivCare Inc.	367	9/17/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $2,600.00 $14,500.00 $17,100.00
9	HORN, STELLA	ModivCare Inc.	1360	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - - $ -
10	Inter City Fire Protection District	ModivCare Inc.	2094	11/13/2025	General Unsecured Priority Secured Admin Priority Total	$805.40 $0.00 $0.00 $0.00 $805.40

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
11	JOHNSON, CINDA	ModivCare Solutions, LLC	267	9/15/2025	General Unsecured Priority Secured Admin Priority Total	$200.00 $0.00 $0.00 $0.00 $200.00
12	JONES, EVA	ModivCare Inc.	1327	9/30/2025	General Unsecured Priority Secured Admin Priority Total	$10,000.00 $0.00 $0.00 $0.00 $10,000.00
13	LIEBHAUSER, JOHN	All Metro Aids Inc.	638	9/23/2025	General Unsecured Priority Secured Admin Priority Total	$57,381.00 $0.00 $0.00 $0.00 $57,381.00
14	MILLER, WANITA	TriMed, LLC	211	9/12/2025	General Unsecured Priority Secured Admin Priority Total	$450.00 $0.00 $0.00 $0.00 $450.00
15	MOISEYEVA, VALENTINA	ModivCare Inc.	972	9/29/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $91,374.19 $0.00 $91,374.19
16	NEVEU, SELINA DENISE	ModivCare Inc.	555	9/22/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $50,000.00 $50,000.00
17	RIMER, HEATHER	ModivCare Solutions, LLC	392	9/17/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $11,000.00 $0.00 $11,000.00
18	RODRIGUEZ, JAZMIN A	ModivCare Inc.	916	9/27/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $17,150.00 $0.00 $0.00 $17,150.00
19	STEVENS, SHERLENE	ModivCare Inc.	757	9/24/2025	General Unsecured Priority Secured Admin Priority Total	$1,996,200.00 $3,800.00 $0.00 $0.00 $2,000,000.00

Schedule 4

(NO LIABILITY CLAIM)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	MORRIS, BONITA	ModivCare Inc.	547	9/22/2025	General Unsecured Priority Secured Admin Priority Total	$159.96 $0.00 $0.00 $0.00 $159.96