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' MOTION FOR ENTRY OF FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

ModivCare Inc. and its reorganized debtor affiliates in the above-captioned cases (collectively, the "***Debtors***" or, after the Effective Date[2], the "***Reorganized Debtors***") respectfully state as follows in support of this motion (this "***Motion***"):

RELIEF REQUESTED

1. By this Motion, the Reorganized Debtors request entry of a final decree, substantially in the form attached hereto (the "***Final Decree***"), closing each of the Reorganized Debtors' chapter 11 cases other than the cases of ModivCare Solutions, LLC (Case No. 25-90359),

[1] A complete list of each of the Reorganized Debtors in these 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 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 meaning ascribed to them in the First Day Declaration or the Plan (each as defined herein), as applicable.

ModivCare Inc. (Case No. 25-90309), Higi SH LLC (Case No. 25-90355), CareGivers America, LLC (Case No. 25-90339), Care Finders Total Care LLC (Case No. 25-90333), Valued Relationships, Inc. (Case No. 25-90376), All Metro Home Care Services of New York, Inc. (Case No. 25-90319), Circulation, Inc. (Case No. 25-90343), A & B Homecare Solutions, L.L.C. (Case No. 25-90310), All Metro Home Care Services of Florida, Inc. (Case No. 25-90317), Multicultural Home Care Inc. (Case No. 25-90360), Panhandle Support Services, Inc. (Case No. 25-90366), and Red Top Transportation, Inc. (Case No. 25-90364) (collectively, the "***Remaining Cases***"), and granting related relief.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") has jurisdiction to consider this Motion under 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157, and this Court may enter a final order consistent with Article III of the United States Constitution.

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

4. The statutory and legal predicates for the relief requested herein are section 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "***Bankruptcy Code***"), Rule 3022 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), Rule 9013-1(i) 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

5. On August 20, 2025 (the "***Petition Date***"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the "***Chapter 11 Cases***"). 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] (the "***First Day Declaration***").

6. On the Petition Date, the Court entered the Order Directing Joint Administration of Chapter 11 Cases [Docket No. 27]. The Reorganized Debtors' Chapter 11 Cases proposed to be closed (collectively, the "***Affiliate Cases***," and the Reorganized Debtors in such cases, the "***Affiliate Debtors***") are as follows:

	Debtor	Case No.
1.	A.E. Medical Alert, Inc.	25-90308 (ARP)
2.	ABC Homecare LLC	25-90311 (ARP)
3.	All Metro AIDS, Inc.	25-90312 (ARP)
4.	All Metro Associate Payroll Services Corporation	25-90313 (ARP)
5.	All Metro CGA Payroll Services Corporation	25-90314 (ARP)
6.	All Metro Field Service Workers Payroll Services Corporation	25-90315 (ARP)
7.	All Metro Health Care Services, Inc.	25-90316 (ARP)
8.	All Metro Home Care Services of New Jersey, Inc.	25-90318 (ARP)
9.	All Metro Home Care Services, Inc.	25-90320 (ARP)
10.	All Metro Management and Payroll Services Corporation	25-90321 (ARP)
11.	All Metro Payroll Services Corporation	25-90322 (ARP)
12.	AM Holdco, Inc.	25-90323 (ARP)
13.	AM Intermediate Holdco, Inc.	25-90324 (ARP)
14.	Arsens Home Care, Inc.	25-90325 (ARP)
15.	ARU Hospice, Inc.	25-90326 (ARP)
16.	Associated Home Services, Inc.	25-90327 (ARP)
17.	At-Home Quality Care, LLC	25-90328 (ARP)
18.	Auditory Response Systems, Inc.	25-90329 (ARP)
19.	Barney's Medical Alert-ERS, Inc.	25-90330 (ARP)
20.	California Medtrans Network IPA LLC	25-90331 (ARP)
21.	California Medtrans Network MSO LLC	25-90332 (ARP)

22.	Caregivers Alliance, LLC	25-90334 (ARP)
23.	CareGivers America Home Health Services, LLC	25-90335 (ARP)
24.	CareGivers America Medical Staffing, LLC	25-90336 (ARP)
25.	CareGivers America Medical Supply, LLC	25-90337 (ARP)
26.	CareGivers America Registry, LLC	25-90338 (ARP)
27.	Caregivers On Call, Inc.	25-90340 (ARP)
28.	CGA Holdco, Inc.	25-90341 (ARP)
29.	CGA Staffing Services, LLC	25-90342 (ARP)
30.	Florida Medtrans Network LLC	25-90344 (ARP)
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32.	Guardian Medical Monitoring, LLC	25-90346 (ARP)
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40.	Higi SH Holdings Inc.	25-90354 (ARP)
41.	Independence Healthcare Corporation	25-90356 (ARP)
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55.	TriMed, LLC	25-90374 (ARP)
56.	Union Home Care LLC	25-90375 (ARP)
57.	Victory Health Holdings, LLC	25-90377 (ARP)
58.	VRI Intermediate Holdings, LLC	25-90378 (ARP)

7. On December 5, 2025, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Reorganization for ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (the "***Plan***"). On December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates and (II) Denying Motions of Official Committee of Unsecured Creditors for Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Causes of Action on Behalf of Debtors' Estates* [Docket No. 1055] (the "***Confirmation Order***").

8. On December 29, 2025, the Plan was substantially consummated, and the Effective Date occurred.[3] From and after the Effective Date, the Reorganized Debtors have focused on resolving any remaining claims, including, *inter alia*, by filing, where appropriate, claims objections (the "***Claims Objections***").[4] Additionally, pursuant to the Plan, the deadline for estate professionals to file final fee applications (the "***Fee Applications***") was February 12, 2026 (*i.e.* forty-five days after the Effective Date).

9. Certain matters or proceedings may continue to arise in respect of the Chapter 11 Cases, including without limitation the Claims Objections, motions concerning the resolution of

[3] *See Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* [Docket No. 1134].

[4] The Reorganized Debtors reserve their rights to object to claims to the extent provided in the Plan and Confirmation Order.

claims, adversary proceedings, and related applications, pleadings, and objections (collectively, the "***Remaining Matters***").

10. The Reorganized Debtors submit that the Remaining Matters can be administered through the Remaining Cases without substantive impact on any party in interest.

BASIS FOR RELIEF

11. Section 350(a) of the Bankruptcy Code provides that "[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case." 11 U.S.C. § 350(a). Bankruptcy Rule 3022 directs the court, on its own initiative or on a party in interest's motion, to enter a final decree closing a chapter 11 case after its estate has been fully administered. Fed. R. Bankr. P. 3022.

12. The term "fully administered" is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Bankruptcy Local Rules. *In re JCP Props. Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015) (citing *In re SLI, Inc.*, No. 02-12608, 2005 WL 1668396, at *1 (Bankr. D. Del. June 24, 2005)). The Advisory Committee Note to Bankruptcy Rule 3022 (the "***Advisory Committee Note***"), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

a. whether the order confirming the plan has become final;

b. whether deposits required by the plan have been distributed;

c. whether the property proposed by the plan to be transferred has been transferred;

d. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;

e. whether payouts under the plan have commenced; and

f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

FED. R. BANKR. P. 3022, Advisory Committee Note (1991). Courts look "to the advisory committee's notes on Bankruptcy Rule 3022 in seeking guidance as to the meaning of 'fully administered.'" *See, e.g.*, *JCP Props*., 540 B.R. at 605 (observing that factors (3)-(5) correspond "to whether substantial consummation" of the chapter 11 plan has been achieved); *In re Valence Tech., Inc.*, No. 12-11580-CAG, 2014 WL 5320632, at *1 (Bankr. W.D. Tex. Oct. 17, 2014); *SLI, Inc*., 2005 WL 1668396, at *2; *In re Kliegl Bros. Universal Elec. Stage Lighting Co., Inc*., 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999). Not all of the factors need to be present for the Court to enter a final decree. *See Valence Tech.*, 2014 WL 5320632, at *3 (noting that the six Advisory Committee Note factors "are not exhaustive nor must all six be present to establish that a case should be closed") (citing cases).

13. All of these factors need not be present before a court will enter a final decree. *See, e.g.*, *Walnut Assocs*. *v. Saidel*, 164 B.R. 487, 493 (Bankr. E.D. Pa. 1994). For example, pending adversary proceedings do not necessarily preclude a court from entering a final decree. *See In re JMPNewcor Int'l, Inc*., 225 B.R. 462 (Bankr. N.D. Ill. 1998) (entering a final decree when an adversary proceeding was pending and the debtors still needed to make certain distributions); *In re Valence Tech.*, 2014 WL 5320632, at *4 ("[I]t is well-established that '[t]he continuation of an adversary proceeding . . . is insufficient by itself to keep a case from being considered 'fully administered.'") (citation omitted); *In re McClelland*, 377 B.R. 446, 453 (S.D.N.Y. 2007) ("Fed. R. Bankr. P. 3022 permits entry of a final decree closing the case '[a]fter an estate is fully administered,' which is not necessarily contingent upon the resolution of standalone adversary proceedings")).

14. Here, the foregoing factors weigh strongly in favor of closing each of the Affiliate Cases. Taking each factor in turn, the Effective Date has occurred, and: (a) the Court's order

confirming the Plan is final by virtue of the Confirmation Order entered on December 15, 2025; (b) distributions under the Plan have commenced; (c) property has vested in the Reorganized Debtors under the Plan and any property to be transferred pursuant to the Plan has been transferred; (d) the Reorganized Debtors have assumed management and operation of the reorganized businesses; and (e) the Remaining Matters remain to be resolved but may be administered through the Remaining Cases.

15. While the Reorganized Debtors acknowledge that the payment of certain claims may still be pending in accordance with the Plan, such claims will be paid pursuant to the Plan in accordance with the Bankruptcy Code and the terms of the Plan. Moreover, "[t]he court should not keep [a] case open only because of the possibility that the court's jurisdiction may be invoked in the future." FED. R. BANKR. P. 3022, Advisory Comm. Note (1991). Furthermore, the entry of final decrees closing the Affiliate Cases is without prejudice to creditors' rights to petition the Court to reopen any of such cases pursuant to section 350(b) of the Bankruptcy Code.

16. In addition to weighing the six Advisory Committee Note factors for purposes of determining whether a case has been fully administered, courts also consider whether the plan has been substantially consummated. *See JCP Props.*, 540 B.R. at 605 (noting that "substantial consummation is the pivotal question here to determine the propriety of closing the . . . case by Final Decree."). Section 1101(2) of the Bankruptcy Code defines "substantial consummation" as the: (a) transfer of all or substantially all of the property proposed by the plan to be transferred; (b) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (c) commencement of distribution under the plan. 11 U.S.C. § 1101(2).

17. Here, as noted above in the discussion of the Advisory Committee Note factors, the Effective Date has occurred and all three elements under the Bankruptcy Code's definition of "substantial consummation" are present. Therefore, the Plan has been substantially consummated.

18. Additionally, business reasons favor closing the Affiliate Cases. Until those cases are closed, the Reorganized Debtors will continue to incur U.S. Trustee fees and reporting expenses for them. Closing the Affiliate Cases will allow the Reorganized Debtors and their employees to focus on their ordinary course business affairs.

19. Finally, entry of a final decree closing the Affiliate Cases will not adversely affect the substantive rights of any party in interest. *See In re Clayton*, 101 F.3d 697, 1996 WL 661099, at *1 (5th Cir. 1996) ("[E]ntry of a final decree is merely a perfunctory, administrative event and nothing more than a ministerial housekeeping act which was never designed to determine with finality the substantive rights of parties involved in a Chapter 11 case.") (quoting *Greater Jacksonville Transp. Co. v. Willis (In re Greater Jacksonville Transp. Co.)*, 169 B.R. 221, 224 (Bankr. M.D. Fla. 1994)); *see also In re Gould*, 437 B.R. 34, 38 (Bankr. D. Conn. 2010) (noting that a final decree "simply delineates on the docket that the case is closed; it represents the administrative conclusion of the case for recording keeping purposes.").

20. Although the Reorganized Debtors will continue working to resolve the Remaining Matters, such matters may be addressed, as appropriate, through the Remaining Cases without prejudice to the substantive rights of any party in interest. Closing the Affiliate Cases will have no impact on the resolution of remaining claims or distributions, other legal entitlements under the Plan, or the substantive rights of any party in interest. Accordingly, the Remaining Matters may be administered without keeping the Affiliate Cases open.

NOTICE

21. Notice of this Motion will be given to 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.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Final Decree, substantially in the form attached hereto, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

Dated: October 1, 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

Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on October 1, 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.

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

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)

FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES

Upon the motion (the "***Motion***")[2] of the Reorganized Debtors for entry of a final decree (this "***Final Decree***") closing certain of the Chapter 11 Cases, all as more fully described in the Motion; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion 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 this 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 Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given under the circumstances and that no other or further notice is necessary; and all objections, if any, to entry of this Final Decree having been withdrawn, resolved, or overruled; and upon the record herein; and after due deliberation thereon; the Court having determined that there is good and sufficient cause for the relief granted in this Final Decree, it is hereby

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1 A complete list of each of the Reorganized Debtors in these 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 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 meaning ascribed to them in the Motion.

ORDERED THAT:

1. The following Affiliate Cases are hereby closed; *provided that* this Court shall retain jurisdiction as provided in the Plan and the Confirmation Order:

	Debtor	Case No.
1.	A.E. Medical Alert, Inc.	25-90308 (ARP)
2.	ABC Homecare LLC	25-90311 (ARP)
3.	All Metro AIDS, Inc.	25-90312 (ARP)
4.	All Metro Associate Payroll Services Corporation	25-90313 (ARP)
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7.	All Metro Health Care Services, Inc.	25-90316 (ARP)
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12.	AM Holdco, Inc.	25-90323 (ARP)
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16.	Associated Home Services, Inc.	25-90327 (ARP)
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19.	Barney's Medical Alert-ERS, Inc.	25-90330 (ARP)
20.	California Medtrans Network IPA LLC	25-90331 (ARP)
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22.	Caregivers Alliance, LLC	25-90334 (ARP)
23.	CareGivers America Home Health Services, LLC	25-90335 (ARP)
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33.	Health Trans, Inc.	25-90347 (ARP)
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36.	Helping Hand Home Health Care Agency Inc	25-90350 (ARP)
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38.	Higi Care Holdings, LLC	25-90352 (ARP)
39.	Higi Care, LLC	25-90353 (ARP)
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41.	Independence Healthcare Corporation	25-90356 (ARP)
42.	Metropolitan Medical Transportation IPA, LLC	25-90357 (ARP)
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45.	New England Emergency Response Systems, Inc.	25-90363 (ARP)
46.	OEP AM, Inc.	25-90365 (ARP)
47.	Personal In-Home Services, Inc.	25-90368 (ARP)
48.	Philadelphia Home Care Agency, Inc.	25-90371 (ARP)
49.	Provado Technologies, LLC	25-90362 (ARP)
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52.	Secura Home Health Holdings, Inc.	25-90370 (ARP)
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56.	Union Home Care LLC	25-90375 (ARP)
57.	Victory Health Holdings, LLC	25-90377 (ARP)

58.	VRI Intermediate Holdings, LLC	25-90378 (ARP)

2. The Remaining Cases shall remain open pending entry of final decrees closing those cases.

3. The Clerk shall update the dockets of the Affiliate Cases to reflect their closure. The Remaining Cases shall continue to be jointly administered under the existing lead case, *In re ModivCare Inc*., Case No. 25-90309 (ARP).

4. The Reorganized Debtors, no later than sixty (60) days after the date of entry of this Final Decree, shall file a post-confirmation quarterly report for the last period during which the Affiliate Cases remained open through the date of the entry of this Final Decree, and shall serve a true and correct copy of said statements on the Office of the United States Trustee for the Southern District of Texas (the "***U.S. Trustee***").

5. The Reorganized Debtors shall pay all quarterly fees due and payable under 28 U.S.C. § 1930(a)(6) for the Affiliate Cases through the quarter in which each such case is closed, and furnish evidence of such payment to the U.S. Trustee. This Court shall retain jurisdiction to enforce payment of those fees.

6. Subject to the Plan and the Confirmation Order, the Remaining Matters concerning the Affiliate Cases, including any Claims Objections with respect to claims against the Affiliate Debtors, may be filed, administered, and adjudicated in the jointly administered lead case, Case No. 25-90309 (ARP), without the need to reopen the Affiliate Cases. Entry of this Final Decree does not itself allow or disallow any Claim or Interest or alter any applicable objection deadline. The Reorganized Debtors and parties in interest retain their respective rights and defenses under the Plan and the Confirmation Order.

7. Entry of this Final Decree is without prejudice to (a) the rights of the Reorganized Debtors or any party in interest to seek to reopen any of the Affiliate Cases for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the rights of the Reorganized Debtors or any Entity authorized pursuant to the Plan, as applicable, to dispute in the Bankruptcy Court or any applicable non-bankruptcy forum any claims filed against the Debtors in the Chapter 11 Cases, as contemplated by the Plan and the Confirmation Order. Nothing in this Final Decree alters the allowance, objection, or disallowance provisions of the Plan or the Confirmation Order.

8. Quarterly disbursements in each Remaining Case shall continue to be reported, and quarterly fees shall continue to be paid, until entry of a final decree closing that case, as required by applicable law and the Plan.

9. This Final Decree shall be effective and enforceable immediately upon its entry.

10. The Reorganized Debtors or any Entity authorized pursuant to the Plan, and their respective agents are authorized to take all actions necessary to implement or effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

11. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Final Decree.

Signed: _____, 2026
Houston, Texas

_____
ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE