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-EIGHTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (REDUCE AND ALLOW CLAIMS AND NO LIABILITY CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO REDUCE OR 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 REDUCED OR DISALLOWED WITHOUT A HEARING. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON ATTACHED SCHEDULES 1 AND 2.

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***"), (a) reducing and allowing, in the reduced amounts and classifications set forth therein, the claims listed on **Schedule 1** to the Proposed Order (the "***Reduce and Allow Claims***") because, as asserted, such claims are inconsistent with the Reorganized Debtors books and records; and (b) disallowing and expunging the claims listed on **Schedule 2** to the Proposed Order (the "***No Liability Claims***" and together with the Reduce and Allow Claims, the "***Disputed Claims***") because such claims seeks recovery of amounts for which the Reorganized Debtors are not liable.

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 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

[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.

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), 502, and 507 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 "***Petition Date***"), 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, at 5:00 p.m. (prevailing Central Time), 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];

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 Disputed Claims along with this Objection.

(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.").

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) set forth in the Objection Procedures, including that Claims are inconsistent with the Reorganized Debtors' books and records or seek recovery of amounts for which the Reorganized Debtors are not liable. See Objection Procedures ¶¶ 1(a), (c).

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 September 28, 2026, the Court entered the *Order Granting Reorganized Debtors' Third Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1780], which extended the Claims Objection Deadline through and including December 28, 2026, without prejudice to the Reorganized Debtors' right to seek a further extension.

THE DISPUTED CLAIMS

16. The Reorganized Debtors' review of the Claims Register, applicable Claim Forms, and the Reorganized Debtors' books and records allowed them to identify the Disputed Claims. Specifically, as attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Twenty-Eighth Omnibus Objection to Certain Claims (Reduce and Allow Claims and No Liability Claims)* attached hereto as **Exhibit A**, based on their review of the Claims Register, the

[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.").

Reorganized Debtors and their advisors identified the two categories of Disputed Claims set forth below:

- **Reduce and Allow Claims:** Based on the Reorganized Debtors' books and records, the twenty-six Claims listed on **Schedule 1** seek amounts in excess of what the Reorganized Debtors owe such Claimants based on the Reorganized Debtors' claims reconciliation. The Reorganized Debtors' claims reconciliation reduces the aggregate asserted amount of such Claims from $ 2,697,425.11 to $ 1,071,452.18. The Reorganized Debtors seek entry of the Proposed Order Allowing each of the Reduce and Allow Claims in the amounts set forth on **Schedule 1**, with any amounts in excess of the reduced amounts reflected on **Schedule 1** being disallowed and expunged.

- **No Liability Claims:** The two Claims listed on **Schedule 2**—Claim No. 464, filed by Allabaugh, Wendy, and Claim No. 507, filed by Lohmeyer, JoAnne—assert an aggregate amount of $3,696.22 for which the Reorganized Debtors are not liable. The Reorganized Debtors therefore seek disallowance and expungement of both Claims in their entirety.

17. To identify the Disputed Claims, the Reorganized Debtors:

(a) reviewed the Claims Register and their books and records to determine instances in which a Claim was asserted in an amount that is inconsistent with the Reorganized Debtors' books and records;

(b) consulted with their advisors to determine instances in which certain Claims seek recovery of amounts for which the Reorganized Debtors are not liable; and

(c) determined that the Disputed Claims are Claims which were either asserted in an amount inconsistent with the Reorganized Debtors' books and records or, otherwise, are Claims for which the Reorganized Debtors are not liable.

18. Consistent with the Objection Procedures, each of the schedules appended to the Proposed Order includes only Claims subject to a common basis for objection. Each schedule identifies the pertinent section and page of this Objection and states the claim-specific basis for the requested relief. *See* Objection Procedures, ¶ 4.

19. Accordingly, the Reorganized Debtors request that the Disputed Claims be reduced and allowed or disallowed and expunged, as applicable, solely to the extent set forth in the Proposed Order (and each of **Schedules 1 and 2** thereto).

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). Bankruptcy Rule 3007(c) permits the Court to authorize omnibus objections on grounds beyond those listed in Bankruptcy Rule 3007(d). Here, the Omnibus Objection Procedures Order authorize the Reorganized Debtors to file omnibus objections to claims based on, *inter alia*, the "Additional Grounds" (as defined in the Omnibus Objection Procedures Order) set forth in the Objection Procedures.

21. 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)).

I. The Reduce and Allow Claims Should Be Reduced and Allowed in the Amounts Set Forth on Schedule 1 to the Proposed Order.

22. The Objection Procedures expressly authorize the Reorganized Debtors to object to Claims that are inconsistent with the Reorganized Debtors' books and records. Objection Procedures ¶ 1(a). Based on the Reorganized Debtors' review of the Reduce and Allow Claims, and subsequent reconciliation of such claims with their books and records, the Reorganized Debtors have determined that the Reduce and Allow Claims assert amounts in excess of what the Reorganized Debtors owe.

23. Accordingly, the Reorganized Debtors submit that each Reduce and Allow Claim should be reduced and allowed in the amount set forth on **Schedule 1** to the Proposed Order, with the portion of each Reduce and Allow Claim exceeding that reduced amount being disallowed and expunged.

II. The No Liability Claims Should Be Disallowed Because the Reorganized Debtors Do Not Owe the Asserted Amount.

24. The Objection Procedures expressly authorize the Reorganized Debtors to object to Claims which seek recovery of amounts for which the Reorganized Debtors are not liable. Objection Procedures, ¶ 1(c). The No Liability Claims seek recovery of amounts for which the Reorganized Debtors are not liable. Proof of Claim No. 507 asserts that the basis of the Claim is "services performed," but the only supporting documentation appended to the Claim is an invoice reflecting a cellular-rental account balance for which ***the Claimant*** owes ***the Reorganized Debtors*** the aggregate sum of $36.38. Claim No. 464 concerns the Claimant's request for access to her 401(k) account to effect a rollover. Based on the Reorganized Debtors' reconciliation, that request does not reflect an unpaid obligation of the Reorganized Debtors. Accordingly, the Claimant's own supporting documentation is inconsistent with—indeed it contradicts—the notion that the Claimant holds ***any*** Claim against the Reorganized Debtors.

25. Accordingly, each No Liability Claim should be disallowed and expunged in its entirety because it seeks recovery of amounts for which the Reorganized Debtors are not liable.

RESERVATION OF RIGHTS

26. 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 Disputed Claim or any other Claim on any other grounds that the Reorganized Debtors discover or elect to pursue.

27. 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

28. 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.

29. 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: October 26, 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 October 26, 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-EIGHTH OMNIBUS OBJECTION TO CERTAIN
CLAIMS (REDUCE AND ALLOW CLAIMS AND NO LIABILITY CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Twenty-Eighth Omnibus Objection to Certain Claims (Reduce and Allow Claims and No Liability Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas.

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

[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.

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

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 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 authorizes the Reorganized Debtors to undertake the claims allowance process. The Objection seeks to: (i) reduce and allow each of the Reduce and Allow Claims, in the amounts set forth on **Schedule 1** to the Proposed Order; and (ii) to disallow and expunge each of the No Liability Claims in its entirety.

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

(a) reviewed the Claims Register and their books and records to determine instances in which a Claim was asserted in an amount that is inconsistent with the Reorganized Debtors' books and records;

(b) consulted with their advisors to determine instances in which certain Claims seek recovery of amounts for which the Reorganized Debtors are not liable; and

(c) determined that the Disputed Claims are Claims which were either asserted in an amount inconsistent with the Reorganized Debtors' books and records or, otherwise, are Claims 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: October 26, 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-EIGHTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (REDUCE AND ALLOW CLAIMS AND NO LIABILITY CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") reducing and allowing the Reduce and Allow Claims listed on **Schedule 1** hereto and disallowing and expunging the No Liability Claims listed on **Schedule 2** 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

[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.

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

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 Reduce and Allow Claim listed on **Schedule 1** is reduced and allowed in the amount set forth in the "Proposed Allowed Amount" column of **Schedule 1**. The portion of each such Claim exceeding that Proposed Allowed Amount is disallowed and expunged.

3. Each No Liability Claim listed on Schedule 2 is disallowed and expunged in its entirety.

4. 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.

5. Except to the extent expressly adjudicated herein, nothing in the Objection or this Order waives the Reorganized Debtors' rights to object to Claims on other grounds or constitutes an admission of liability.

6. 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.

7. Except to the extent expressly adjudicated herein, all rights, claims, defenses, and counterclaims of the Reorganized Debtors, including rights of setoff, are reserved.

8. 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.

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

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

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

Signed: _____, 2026

_____
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Schedule 1

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Filed Claim Amount	Proposed Allowed Amount
1	1st Class Top Choice Senior Transit LLC	ModivCare Inc.	390	09/18/2025	General Unsecured	$1,754.50	$162.00
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$1,754.50**	**$162.00**
2	Broadridge Financial Solutions	ModivCare Inc.	10	08/25/2025	General Unsecured	$195,629.61	$172,603.93
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$195,629.61**	**$172,603.93**
3	CAROLINA WATER SPECIALTIES LLC	ModivCare Solutions, LLC	535	09/22/2025	General Unsecured	$296.76	$244.11
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$296.76**	**$244.11**
4	DATA STRUCTION, INC.	All Metro Health Care Services, Inc.	628	09/23/2025	General Unsecured	$10,200.68	$5,043.00
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$10,200.68**	**$5,043.00**
5	Enghouse Interactive Inc.	Care Finders Total Care LLC	839	09/26/2025	General Unsecured	$196,831.78	$196,410.54
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$196,831.78**	**$196,410.54**
6	FIRST FLASH JANITORIAL SERVICES INC	ModivCare Inc.	208	09/15/2025	General Unsecured	$14,323.06	$2,938.70
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$14,323.06**	**$2,938.70**
7	GIBSON, DUNN & CRUTCHER LLP	ModivCare Inc.	1661	10/01/2025	General Unsecured	$848,315.30	$92,749.70
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$848,315.30**	**$92,749.70**
8	GPI-OCS, LLC	ModivCare Inc.	1387	10/01/2025	General Unsecured	$687,577.82	$284,228.65
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$687,577.82**	**$284,228.65**
9	HARRISON RAINEY INC	ModivCare Inc.	673	09/23/2025	General Unsecured	$883.86	$467.81
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$883.86**	**$467.81**
10	JEMPS MANAGEMENT	Care Finders Total Care LLC	172	09/12/2025	General Unsecured	$2,878.90	$2,368.11
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$2,878.90**	**$2,368.11**
11	Kean Miller LLP	ModivCare Solutions, LLC	762	09/25/2025	General Unsecured	$84,439.04	$83,989.04
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$84,439.04**	**$83,989.04**
12	KORE Wireless Inc, A KORE Wireless Group Company	Valued Relationships, Inc.	57	09/03/2025	General Unsecured	$115,770.42	$25,967.28
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$115,770.42**	**$25,967.28**
13	LetzChat, Inc.	ModivCare Inc.	133	09/11/2025	General Unsecured	$1,618.38	$1,416.08
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$809.19	$0.00
					Total	**$2,427.57**	**$1,416.08**
14	MILLERS HOUSEWARES INC	All Metro Home Care Services of New York, Inc.	191	09/14/2025	General Unsecured	$930.95	$874.12
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$930.95**	**$874.12**
15	NST Battery LLC	Valued Relationships, Inc.	79	09/09/2025	General Unsecured	$1,568.50	$70.00
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$1,568.50**	**$70.00**
16	NUMERA SYSTEMS US INC.	Valued Relationships, Inc.	210	09/15/2025	General Unsecured	$15,720.00	$2,909.68
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$15,720.00**	**$2,909.68**
17	PJG Enterprises Inc.	Arsens Home Care, Inc.	193	09/12/2025	General Unsecured	$6,232.80	$5,126.98
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$6,232.80**	**$5,126.98**
18	PJSJ ENTERPRISES INC	All Metro Health Care Services, Inc.	192	09/12/2025	General Unsecured	$1,738.00	$1,487.46
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$1,738.00**	**$1,487.46**
19	PRINTING INC DBA JWH ASSOCIATES	Care Finders Total Care LLC	356	09/16/2025	General Unsecured	$11,923.08	$3,974.17
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$11,923.08**	**$3,974.17**
20	QUALITY SERVICES LLC	Caregivers America, LLC.	416	09/17/2025	General Unsecured	$1,345.38	$1,307.90
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$1,345.38**	**$1,307.90**

Schedule 1

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Filed Claim Amount	Proposed Allowed Amount
21	REDICO Management, Inc.	ModivCare Inc.	1640	10/01/2025	General Unsecured	$349,503.13	$100,599.25
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$349,503.13**	**$100,599.25**
22	SOURCEPASS, LLC	Higi SH LLC	843	09/26/2025	General Unsecured	$5,575.00	$1,211.96
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$5,575.00**	**$1,211.96**
23	Stone Kalfus LLP	ModivCare Inc.	132	09/11/2025	General Unsecured	$10,215.00	$7,552.00
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$10,215.00**	**$7,552.00**
24	Tech Service Today LLC	ModivCare Inc.	435	09/18/2025	General Unsecured	$20,399.02	$20,152.02
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$20,399.02**	**$20,152.02**
25	Wick Shopping Plaza Associates, L.L.C.	ModivCare Inc.	831	09/26/2025	General Unsecured	$27,247.85	$161.85
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$27,247.85**	**$161.85**
26	Wick Shopping Plaza Associates, L.L.C.	ModivCare Inc.	836	09/26/2025	General Unsecured	$83,697.10	$57,435.84
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$83,697.10**	**$57,435.84**

SCHEDULE 2

Schedule 2

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	Allabaugh, Wendy	ModivCare Inc.	464	09/18/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$3,659.84
					Total	**$3,659.84**
2	Lohmeyer, JoAnne	ModivCare Inc.	507	09/19/2025	General Unsecured	$0.00
					Priority	$36.38
					Secured	$0.00
					Admin Priority	$0.00
					Total	**$36.38**