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)

CERTIFICATE OF NO OBJECTION REGARDING REORGANIZED DEBTORS' EIGHTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (AMENDED AND SUPERSEDED CLAIMS)
[Related to Docket No. 1736]

Pursuant to the Procedures for Complex Cases in the Southern District of Texas (the "***Complex Case Procedures***"), the undersigned hereby certifies as follows:

1. On August 18, 2026, the Reorganized Debtors filed the *Reorganized Debtors' Eighteenth Omnibus Objection to Certain Claims (Amended and Superseded Claims)* [Docket No. 1736] (the "***Objection***").

2. The deadline for claimants whose claims were subject to the Objection to respond was September 17, 2026 (the "***Objection Deadline***").

3. The Objection Deadline passed, and in accordance with paragraph 44 of the Complex Case Procedures, the undersigned represents to the Court that counsel has reviewed the Court's docket and no objections or other responses to the Objection have been filed, and the Reorganized Debtors are unaware of any other objection or response to the Objection.

[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.

4. Accordingly, the Reorganized Debtors respectfully request that the Court enter the proposed order attached hereto.

[*Remainder of page intentionally left blank.*]

Dated: October 27, 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 October 27, 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

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

ORDER GRANTING REORGANIZED DEBTORS' EIGHTEENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM
[Relates to Docket No. 1736]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Superseded Claims set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and after due deliberation thereon; and the

[1] A complete list of each of the Reorganized Debtors in these chapter 11 cases (the "***Chapter 11 Cases***") and the last four digits of each Debtor's taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors' claims and noticing agent at https://www.veritaglobal.net/ModivCare. Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100, Denver, Colorado 80237.

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

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

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

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

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

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

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

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

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

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

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

Signed: _____, 2026

_____
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Schedule 1 — Superseded and Amended Claims

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

Schedule 1 — Superseded and Amended Claims

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

Schedule 1 — Superseded and Amended Claims

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

Schedule 1 — Superseded and Amended Claims

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