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' TWENTY-FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)
[Related to Docket No. 1776]

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 September 24, 2026, the Reorganized Debtors filed the *Reorganized Debtors' Twenty-Fifth Omnibus Objection to Certain Claims (Blank Claims)* [Docket No. 1776] (the "***Objection***").

2. The deadline for claimants whose claims were subject to the Objection to respond was October 25, 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' TWENTY-FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)
[Relates to Docket No. 1776]

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