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'
PRELIMINARY RESPONSE TO FRANCES DOUGLAS'S MOTION
FOR RELIEF FROM STAY AND RESERVATION OF RIGHTS
[Relates to Docket Nos. 1805 and 1806]

The above-captioned reorganized debtors (prior to the Effective Date,[2] collectively, the "***Debtors***" and after the Effective Date, collectively, the "***Reorganized Debtors***"), by and through their undersigned counsel, hereby submit this Preliminary Response and Reservation of Rights (this "***Response***") to the *Motion to Lift the Automatic Stay or, in the Alternative, to Modify or Waive the Stay to Permit Continuation of Pending Federal Civil Action* [Docket No. 1805] and *Douglas' Update to the Court to Uplift the Automatic Stay* [Docket No. 1806] (together, the "***Motion***") filed by Frances Douglas (the "***Movant***"), and, in support thereof, respectfully state as follows:

PRELIMINARY RESPONSE AND RESERVATION OF RIGHTS

1. The Reorganized Debtors were able to speak with the Movant, by telephone, on October 29, 2026, regarding a potential resolution of the Motion. As a result of those discussions,

[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 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.

the Reorganized Debtors have sent the Movant, by mail (per the Movant's request), a proposed stipulation and agreed order memorializing the terms proposed by the Reorganized Debtors to consensually resolve the Motion (the "***Proposed Stipulation and Agreed Order***"). The Movant has informed the Reorganized Debtors' counsel that she will review the Proposed Stipulation and Agreed Order, and, if acceptable to the Movant, she will return the Proposed Stipulation and Agreed Order, by mail, with her signature affixed and, in any event, will contact counsel to the Reorganized Debtors by telephone after reviewing the Proposed Stipulation and Agreed Order to inform the Reorganized Debtors whether the Proposed Stipulation and Agreed Order memorializes an acceptable resolution of the Motion.

2. The Reorganized Debtors reserve all rights with respect to the Motion, including, but not limited to, the right to file an objection opposing the Motion if the Reorganized Debtors and the Movant are unable to reach a mutually agreeable resolution of the Motion.

[*Remainder of page intentionally left blank.*]

Dated: October 30, 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 30, 2026, a true and correct copy of the foregoing document, was served through 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 and by first-class mail on: Frances Douglas P.O. Box 74 Startex, SC 29377.

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