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' THIRTY-FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (FAILURE TO SPECIFY AMOUNT CLAIMS, RECLASSIFIED CLAIMS, AND REDUCE AND RECLASSIFY CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW, RECLASSIFY, OR REDUCE AND RECLASSIFY 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 DISALLOWED, RECLASSIFIED, OR REDUCED AND RECLASSIFIED WITHOUT A HEARING. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON ATTACHED SCHEDULES 1, 2, AND 3.

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) disallowing and expunging the claims listed on **Schedule 1** to the Proposed Order because such claims fail to specify the asserted claim amount (the **"*Failure to Specify Amount Claims*"**); (b) reclassifying the claims listed on **Schedule 2** to the Proposed Order in the classifications set forth therein (the **"*Reclassified Claims*"**); and (c) reducing, reclassifying, and allowing the claims listed on **Schedule 3** to the Proposed Order in the amounts and classifications set forth therein, with any amounts in excess of those allowed amounts disallowed and expunged (the **"*Reduce and Reclassify Claims*"** and, together with the Failure to Specify Amount Claims and Reclassified Claims, the **"*Disputed Claims*"**).

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, 503, 506, and 507 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "***Bankruptcy Code***"), Rules 3007 and 3012 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.

[3] Docket No. 1055.

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 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 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 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***

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[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]; (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.").

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.

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, fail to specify the asserted Claim amount, or are incorrectly or improperly classified. See Objection Procedures ¶¶ 1(a), (b), (d).

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 supporting documentation, and their books and records allowed them to identify the Disputed Claims. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors'*

[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.").

Thirty-Fourth Omnibus Objection to Certain Claims (Failure to Specify Amount Claims, Reclassified Claims, and Reduce and Reclassify Claims), attached hereto as **Exhibit A** (the "***Shepard Affidavit***"), the Reorganized Debtors and their advisors identified the three categories of Disputed Claims set forth below:

- **Failure to Specify Amount Claims:** The Claims listed on **Schedule 1** do not specify the asserted amount or provide sufficient information for the Reorganized Debtors to determine the amount of the alleged obligation. The Reorganized Debtors seek disallowance and expungement of the Failure to Specify Amount Claims in their entirety;

- **Reclassified Claims:** The Claims listed on **Schedule 2** assert an entitlement to administrative or priority treatment, in whole or in part, for which such Claims are not entitled. The Reorganized Debtors seek to reclassify each Reclassified Claim as set forth on **Schedule 2**. This Objection does not seek to reduce or allow the underlying amounts of the Reclassified Claims. Except as to the classifications sought herein, the Reorganized Debtors expressly reserve all rights to object to the underlying amounts, validity, or enforceability of the Reclassified Claims on any other grounds; and

- **Reduce and Reclassify Claims:** The Claims listed on **Schedule 3** seek recovery of amounts in excess of the amounts owed by the Reorganized Debtors and assert an entitlement to administrative or priority treatment, in whole or in part, to which such Claims are not entitled. The Reorganized Debtors seek to reduce, reclassify, and allow each Reduce and Reclassify Claim in the amounts and classifications set forth on **Schedule 3**, with any excess amount disallowed and expunged.

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

(a) reviewed the Claims Register, Claim Forms (including supporting documentation) and their books and records to determine instances in which a Claim was asserted in an amount and/or classification (i.e., an assertion of entitlement to priority treatment) that was inconsistent with the Reorganized Debtors' books and records; and

(b) determined that: (i) the Failure to Specify Amount Claims fail to assert an amount and, otherwise, do not include sufficient information to permit the Reorganized Debtors to determine the amount of the Claim; (ii) the Reclassify Claims assert an entitlement to administrative or priority treatment, in whole or in part, for which such Claims are not entitled; and (iii) the Reduce and Reclassify Claims both (1) seek recovery of amounts in excess of what the Reorganized Debtors owe based on their books and records, and (2) assert an

entitlement to administrative or priority treatment for which such Claims are not entitled.

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.

BASIS FOR RELIEF

19. 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 authorizes 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.

20. 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)).

A. The Failure to Specify Amount Claims Should Be Disallowed And Expunged.

21. The Objection Procedures authorize the Reorganized Debtors to object to Claims that fail to specify the asserted Claim amount or list the amount only as unliquidated. Objection Procedures ¶ 1(b). The Claim Forms (including supporting documentation appended thereto) for each of the Failure to Specify Amount Claims fail to specify an asserted amount and, otherwise, do not include sufficient information for the Reorganized Debtors to determine the amount of the asserted Claims.

22. Accordingly, the Failure to Specify Amount Claim should be disallowed and expunged in their entirety.

B. The Reclassified Claims Should Be Reclassified as Set Forth on Schedule 2.

23. The Objection Procedures authorize the Reorganized Debtors to object to Claims that are incorrectly or improperly classified, including Claims asserted as priority Claims, or under section 503(b)(9), that should be reclassified as unsecured, in whole or in part. Objection Procedures ¶ 1(d). Sections 503 and 507 of the Bankruptcy Code govern administrative expenses and the priority of Claims. Bankruptcy Rule 3012 permits the Court to determine the amount of a priority Claim under section 507 in an objection to the Claim.

24. Based on the Reorganized Debtors' review of the applicable Claim Forms, supporting documentation, and their books and records, the Reorganized Debtors have determined that the Reclassified Claims assert an entitlement to administrative or priority treatment, in whole or in part, to which they are not entitled.

25. Accordingly, the Reorganized Debtors request that the Reclassified Claims be reclassified as set forth on **Schedule 2** to the Proposed Order, while preserving any administrative or priority portion retained therein. The Reorganized Debtors reserve their rights to object to such Claims, after their reclassification as set forth on **Schedule 2** to the Proposed Order, on any other grounds including, but not limited to, to object to the amount, validity, and enforceability of such Claims.

C. The Reduce and Reclassify Claims Should Be Reduced, Reclassified, and Allowed as Set Forth on Schedule 3.

26. The Objection Procedures expressly authorize the Reorganized Debtors to object to Claims that are inconsistent with their books and records or are incorrectly or improperly classified. Objection Procedures ¶¶ 1(a), (d). After reconciling the Claim Forms (including supporting documentation appended thereto) with the Reorganized Debtors' books and records, the Reorganized Debtors have determined that the Reduce and Reclassify Claims both (i) seek recovery of amounts in excess of what the Reorganized Debtors owe; and (ii) assert an entitlement to administrative or priority treatment, in whole or in part, which such Claims are not entitled to.

27. Accordingly, the Reduce and Reclassified Claims should be reduced and reclassified, as set forth on **Schedule 3** to the Proposed Order, and allowed in the reduced amounts and classifications set forth on **Schedule 3** to the Proposed Order with any amount of such Claims in excess of what is reflected on **Schedule 3** disallowed and expunged.

RESERVATION OF RIGHTS

29. 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, including, but not limited to, additional objections (on any other grounds, including, but not limited to, the amount, validity, or

enforceability of such Claims) with respect to the Reclassified Claims. 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.

30. 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

31. 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.

32. 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: November 3, 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 November 3, 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' THIRTY-FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (FAILURE TO SPECIFY AMOUNT CLAIMS, RECLASSIFIED CLAIMS, AND REDUCE AND RECLASSIFY CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Thirty-Fourth Omnibus Objection to Certain Claims (Failure to Specify Amount Claims, Reclassified Claims, and Reduce and Reclassify 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. In accordance with the claims allowance process provided for in the Plan, the Reorganized Debtors and their advisors have identified the Disputed Claims for which they seek entry of the Proposed Order (i) disallowing and expunging the Failure to Specify Amount Claims on **Schedule 1**; (ii) reclassifying the Reclassified Claims on **Schedule 2**; and (iii) reducing, reclassifying, and allowing the Reduce and Reclassify Claims on **Schedule 3** in the amounts and classifications set forth therein, with any excess amounts disallowed and expunged in their entirety.

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

(a) reviewed the Claims Register, Claim Forms (including supporting documentation) and their books and records to determine instances in which a Claim was asserted in an amount and/or classification (i.e., an assertion of entitlement to priority treatment) that was inconsistent with the Reorganized Debtors' books and records; and

(b) determined that: (i) the Failure to Specify Amount Claims fail to assert an amount and, otherwise, do not include sufficient information to permit the Reorganized Debtors to determine the amount of the Claim; (ii) the Reclassify Claims assert an entitlement to administrative or priority treatment, in whole or in part, for which such Claims are not entitled; and (iii) the Reduce and Reclassify Claims both (1) seek recovery of amounts in excess of what the Reorganized Debtors owe based on their books and records, and (2) assert an

entitlement to administrative or priority treatment for which such Claims are not entitled.

[*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: November 3, 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' THIRTY-FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (FAILURE TO SPECIFY AMOUNT CLAIMS, RECLASSIFIED CLAIMS, AND REDUCE AND RECLASSIFY CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") (a) disallowing and expunging the Failure to Specify Amount Claims listed on **Schedule 1** hereto; (b) reclassifying the Reclassified Claims listed on **Schedule 2** hereto; and (c) reducing, reclassifying, and allowing the Reduce and Reclassify Claims listed on **Schedule 3** hereto in the amounts and classifications set forth therein, with any excess amounts disallowed and expunged, 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

[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.

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 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 Failure to Specify Amount Claim listed on **Schedule 1** is disallowed and expunged in its entirety.

3. Each Reclassified Claim listed on **Schedule 2** is reclassified as set forth therein. Any administrative or priority portion expressly retained on **Schedule 2** retains the classification specified therein. Except as to the classifications expressly determined herein, this Order does not allow the Reclassified Claims or adjudicate their underlying amounts, validity, or enforceability, and all rights of the Reorganized Debtors to object to those Claims, as reclassified pursuant to this Order, on any other grounds, including, but not limited to, objections to the amount, validity, or enforceability of such Claims, are expressly reserved.

4. Each Reduce and Reclassify Claim listed on **Schedule 3** is reduced, reclassified, and allowed in the amounts and classifications set forth therein. Any amount exceeding the total allowed amount is disallowed and expunged. Any administrative or priority portion expressly allowed on Schedule 3 retains the classification specified therein.

5. 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.

6. 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.

7. 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.

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

9. 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.

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

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

12. 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

(FAILURE TO SPECIFY AMOUNT 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	09/18/2025	General Unsecured Priority Secured Admin Priority Total	Amount Not Stated

SCHEDULE 2

(RECLASSIFIED CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Filed Claim Amount	Proposed Allowed Amount
1	COLLINS MOWING & LAWN CARE	VRI Intermediate Holdings, LLC	1022	09/30/2025	General Unsecured	$0.00	$1,030.00
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$1,145.00	$115.00
					Total	**$1,145.00**	**$1,145.00**
2	Crossroads Technologies	Caregivers America, LLC.	99	09/09/2025	General Unsecured	$1,607.67	$12,664.12
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$12,572.51	$1,516.06
					Total	**$14,180.18**	**$14,180.18**
3	Decisions, LLC	Valued Relationships, Inc.	2521	04/01/2026	General Unsecured	$0.00	$17,966.45
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$17,966.45	$0.00
					Total	**$17,966.45**	**$17,966.45**
4	DS-SL Holdings, LLC dba SLWM, LLC	ModivCare Inc.	829	09/26/2025	General Unsecured	$6,211.54	$8,721.03
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$3,121.59	$612.10
					Total	**$9,333.13**	**$9,333.13**
5	HARDWICK, KATIE	Valued Relationships, Inc.	1156	09/30/2025	General Unsecured	$0.00	$500.00
					Priority	$500.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	**$500.00**	**$500.00**
6	MongoDB INC	ModivCare Inc.	764	09/25/2025	General Unsecured	$0.00	$11,472.73
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$11,472.73	$0.00
					Total	**$11,472.73**	**$11,472.73**
7	WALDRON & COMPANY, INC.	ModivCare Inc.	2033	11/02/2025	General Unsecured	$1,000.00	$6,000.00
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$5,000.00	$0.00
					Total	**$6,000.00**	**$6,000.00**

SCHEDULE 3

(REDUCE AND RECLASSIFY CLAIMS)

					Asserted Claim Amount		
#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Claim Amount	Reconciled Amount
1	City of Sullivan	ModivCare Inc.	76	09/08/2025	General Unsecured	$0.00	$2,110.65
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$2,714.61	$0.00
					Total	$2,714.61	$2,110.65
2	DRIVEBOSS LLC	ModivCare Inc.	199	09/15/2025	General Unsecured	$0.00	$19,030.98
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$23,243.20	$0.00
					Total	$23,243.20	$19,030.98
3	Onepak Inc	ModivCare Solutions, LLC	601	09/23/2025	General Unsecured	$0.00	$8,477.59
					Priority	$0.00	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$15,288.39	$5,712.41
					Total	$15,288.39	$14,190.00
4	Tonkin, Susan	ModivCare Inc.	1035	09/30/2025	General Unsecured	$122,850.00	$140,000.00
					Priority	$21,565.76	$0.00
					Secured	$0.00	$0.00
					Admin Priority	$0.00	$0.00
					Total	$144,415.76	$140,000.00