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 SERVICE

I, Mikayla Cleary, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the claims and noticing agent for the Reorganized Debtors in the above-captioned case.

On October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

- **Notice and Reorganized Debtors' Twenty-Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit Q**; substantially in the form of Docket No. 1811]

- **Notice and Reorganized Debtors' Twenty-Seventh Omnibus Objection to Certain Claims (Insufficient Documentation Claims)** [attached hereto as **Exhibit R**; substantially in the form of Docket No. 1812]

- **Notice and Reorganized Debtors' Twenty-Eighth Omnibus Objection to Certain Claims (Reduce and Allow Claims and No Liability Claims)** [attached hereto as **Exhibit S**; substantially in the form of Docket No. 1813]

- **Notice and Reorganized Debtors' Twenty-Ninth Omnibus Objection to Certain Claims (Invalid Claims)** [attached hereto as **Exhibit T**; substantially in the form of Docket No. 1814]

[1] A complete list of each of the reorganized debtors (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.

- **Notice and Reorganized Debtors' Thirtieth Omnibus Objection to Certain Claims (Invalid Claims)** [attached hereto as **Exhibit U**; substantially in the form of Docket No. 1815]

- **Notice and Reorganized Debtors' Thirty-First Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit V**; substantially in the form of Docket No. 1816]

- **Notice and Reorganized Debtors' Thirty-Second Omnibus Objection to Certain Claims (Insufficient Documentation Claims)** [attached hereto as **Exhibit W**; substantially in the form of Docket No. 1817]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit C**; and via First Class Mail upon the service list attached hereto as **Exhibit D**:

- **Notice and Reorganized Debtors' Twenty-Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)** [attached hereto as **Exhibit Q**; substantially in the form of Docket No. 1811]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit E**; and via First Class Mail upon the service list attached hereto as **Exhibit F**:

- **Notice and Reorganized Debtors' Twenty-Seventh Omnibus Objection to Certain Claims (Insufficient Documentation Claims)** [attached hereto as **Exhibit R**; substantially in the form of Docket No. 1812]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit G**; and via First Class Mail upon the service list attached hereto as **Exhibit H**:

- **Notice and Reorganized Debtors' Twenty-Eighth Omnibus Objection to Certain Claims (Reduce and Allow Claims and No Liability Claims)** [attached hereto as **Exhibit S**; substantially in the form of Docket No. 1813]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit I**; and via First Class Mail upon the service list attached hereto as **Exhibit J**:

- **Notice and Reorganized Debtors' Twenty-Ninth Omnibus Objection to Certain Claims (Invalid Claims)** [attached hereto as **Exhibit T**; substantially in the form of Docket No. 1814]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit K**; and via First Class Mail upon the service list attached hereto as **Exhibit L**:

- **Notice and Reorganized Debtors' Thirtieth Omnibus Objection to Certain Claims (Invalid Claims)** [attached hereto as **Exhibit U**; substantially in the form of Docket No. 1815]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit M**; and via First Class Mail upon the service list attached hereto as **Exhibit N**:

- **Notice and Reorganized Debtors' Thirty-First Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit V**; substantially in the form of Docket No. 1816]

Furthermore, on October 27, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit O**; and via First Class Mail upon the service list attached hereto as **Exhibit P**:

- **Notice and Reorganized Debtors' Thirty-Second Omnibus Objection to Certain Claims (Insufficient Documentation Claims)** [attached hereto as **Exhibit W**; substantially in the form of Docket No. 1817]

Dated: November 4, 2026

/s/ Mikayla Cleary
Mikayla Cleary
Verita
100 N. Pacific Coast Highway,
Suite 100
El Segundo, CA 90245
Tel. 310.823.9000

Exhibit A

Exhibit A

Post-Effective Master Service List

Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
Counsel to Collin County Tax Assessor / Collector	Abernathy, Roeder, Boyd & Hullett, P.C.	Paul M. Lopez, Larry R. Boyd, and Emily M. Hahn	plopez@abernathy-law.com; lboyd@abernathy-law.com; ehahn@abernathy-law.com; bankruptcy@abernathy-law.com
Counsel to Debra Jones	Hayward PLLC	Ron Satija	rsatija@haywardfirm.com
IRS	Internal Revenue Service	Centralized Insolvency Operation	Mimi.M.Wong@irscounsel.treas.gov
IRS	Internal Revenue Service	Centralized Insolvency Operation	Mimi.M.Wong@irscounsel.treas.gov
Counsel to Florence Speaker	Law Firm of Shawn M. Grady, PLLC	Shawn M. Grady	shawn@gradycollectionlaw.com
Top 30 Creditor	Morris And Company	Drew Kenny	dkenny@thinkllp.com
SEC Regional Office	Securities & Exchange Commission	Fort Worth Regional Office	dfw@sec.gov
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	secbankruptcy@sec.gov
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	bankruptcytax@oag.texas.gov; communications@oag.texas.gov
United States Attorney Office for the Southern District of Texas	US Attorney Office, Southern District of Texas		usatxs.atty@usdoj.gov; USATXS.CivilNotice@usdoj.gov
Office of the U.S. Trustee for the Southern District of Texas (Houston Division)	US Trustee for the Southern District of Texas	Jana Smith Whitworth	Jana.Whitworth@usdoj.gov

Exhibit B

Exhibit B

Post-Effective Master Service List
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Counsel to American Express National Bank	Becket & Lee LLP	Christopher Cramer	PO Box 3001		Malvern	PA	19355-0701
IRS	Internal Revenue Service		1919 Smith Street		Houston	TX	77002
Texas Comptroller of Public Accounts	Texas Comptroller of Public Accounts	Attn Bankruptcy Section	Lyndon B Johnson State Office Building	111 East 17th St	Austin	TX	78774
Texas Comptroller of Public Accounts	Texas Comptroller of Public Accounts		PO Box 13528, Capitol Station		Austin	TX	78711-3528
United States Attorney Office for the Southern District of Texas	US Attorney Office, Southern District of Texas	Civil Process Clerk for the U.S. Attorney's Office	1000 Louisiana	Suite 2300	Houston	TX	77002
US Attorney General	US Department of Justice	US Attorney General	950 Pennsylvania Avenue NW		Washington	DC	20530-0001

Exhibit C

Exhibit C

Twenty-Sixth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
2M Enterprise LLC	Yiu Pong Mui	lp@lbmtech.com
AMBULNZ NY, LLC		ap@docgo.com; norm@docgo.com
AMBULNZ NY, LLC		megonzalez@docgo.com; norm@docgo.com
ArQuesha L Harton	ArQuesha Harton	Email on File
ArQuesha L Harton		Email on File
B and S Properties	Brett Whiteside	infoarbor1@gmail.com
Bandwidth Inc.	Leah Webb	lwebb@bandwidth.com
Bober, Chris	Gail Bober	Email on File
Brady Lakhiaminh		Email on File
Careficient, Inc.		ctaylor@careficient.com; billing@careficient.com
CAROLINAS MEDICAL CENTER		dennis.mack@advocatehealth.org
Casey Casto		Email on File
Clallam County Tax Collector	Clallam County Treasurer	jennifer.white@clallamcountywa.gov
COLE, ANGELA		Email on File
Commonwealth Edison Company	ComEd Bankruptcy Department	ComEdBankruptcyGroup@exeloncorp.com
Compass Group USA dba Canteen Refreshment Services		catherine.alion@compass-usa.com
Continental Casualty Company	CNA Insurance Company	cynthia.goral@cna.com
Cynthia A. Gilkerson-Daehnke	CG Daehnke	Email on File
DLR Management Group, LLC d/b/a Contigo Medical Transportation Services	Irving E. De La Rosa Barrientos	irving@contigomedical.com
Dorothy R. Hagopian	Dorothy Hagopian	Email on File
DOWNS, ELLA		Email on File
Dymondlee Silva		Email on File
Eric Wilson		Email on File
FEARS, BRITTANY		Email on File
GADAIRE, LISA		Email on File
GARCIA, EILEEN		Email on File
Hagopian, Dorothy	Dorothy Hagopian	Email on File
Hagopian, Dorothy		Email on File
Harper Law Firm	Rodrick Hackworth	omar@harperlawtx.com
HealthCare Research LLC	myCNAjobs	erica@missioncare.com
HealthSpring, Inc.	Marinea White, HealthSpring Manager of Financial Reporting and Analysis	marinea_white@hcsc.com
HealthSpring, Inc.	Thomas F. Koegel, Counsel for HealthSpring, Inc.	tkoegel@crowell.com
JAMES, SHANDY		Email on File
Jennifer H Rowe		Email on File
Justin Vanicor	Mary Elizabeth Welch	Email on File
Justin Vanicor		Email on File
Kimberly Petty		Email on File
KNEPPER, MICHELE		Email on File
Konica Minolta Business Solutions, Inc.	Denise Mendes	dmendes@kmbs.konicaminolta.us
Konica Minolta Business Solutions, Inc.	Victoria Dripchak	vdripchak@kmbs.konicaminolta.us
Kristin Lynn Riddle		Email on File
Laura Massimi	Eric G. Kahn, Esq.	ekahn@lawjw.com
Leverette, Thomas		Email on File
LLANO, CANDICE		Email on File
Mary L. Mingoia		Email on File
Michael Shane Ragland		Email on File
Moodys Investors Service Inc		john.brigantino@moodys.com
Nasir Dickens		Email on File
PAVONE LLC		eta.metrocab@yahoo.com

Exhibit C

Twenty-Sixth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Phillips, Christina		Email on File
PRN Ambulance LLC	Hooper, Lundy & Bookman	gtorrell@hooperlundy.com
PRN Ambulance LLC	Simon R. Mayer	simon.mayer@lockelord.com
SMITH, ANDREA		Email on File
Stacey Rodriguez		Email on File
Sterling, A First Advantage Company.		Christian.Cuthbert@fadv.com
The Harper Law Firm	Carla Williams	omar@harperlawtx.com
Thomas Leverette		Email on File
Thomas, Jacqueline		Email on File
TOMLIN, BEULAH		Email on File
Tori Woodley		Email on File
WARREN, PATRICK		Email on File
ZABAWA, LORIANN B		Email on File

Exhibit D

Exhibit D

Twenty-Sixth Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Careficient, Inc.		PO Box 947531	Atlanta	GA	30394
Continental Casualty Company	CNA Insurance Company	23453 Network Place	Chicago	IL	60673
FEARS, BRITTANY		Address on File			
GARCIA, EILEEN		Address on File			
NEISWENDER, BARBARA E	Barbara Neiswender	Address on File			
NEISWENDER, BARBARA E		Address on File			
Padilla, Stephanie	Gutierrez, Stephanie D	Address on File			
Padilla, Stephanie		Address on File			
Sterling, A First Advantage Company.		1 Concourse Parkway NE, Suite 200	Atlanta	GA	30328

Exhibit E

Exhibit E

Twenty-Seventh Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	Email
COGHILL, LISA	Email on File
COLLINS, RONNIE	Email on File
Lalla Nabila Azallali El Idrissi	Email on File
PINSON, RONALD	Email on File
ROBINSON, NICK	Email on File
WILLIAMS, SHERETTA DENISE	Email on File

Exhibit F

Exhibit F

Twenty-Seventh Omnibus Objection Claimant Service List

Served via First Class Mail

CreditorName	Address1	City	State	Zip
COLLINS, RONNIE	Address on File			

Exhibit G

Exhibit G

Twenty-Eighth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
1st Class Top Choice Senior Transit LLC		TRANSPORTATION@1STCLASSTOPCHOICE.COM
Allabaugh, Wendy		Email on File
Broadridge Financial Solutions		Creditadministration@broadridge.com
CAROLINA WATER SPECIALTIES LLC		andy@waterprofessionals.com
DATA STRUCTION, INC.	JOE TARULLI	joe@data-struction.com
Enghouse Interactive Inc.	Erin Thornton, Global Facilities Manager	erin.thornton@enghouse.com
Enghouse Interactive Inc.	Stephen Becker	stephen.becker@enghouse.com
FIRST FLASH JANITORIAL SERVICES INC		firstflashinfo@gmail.com
GIBSON, DUNN & CRUTCHER LLP	MIKE HERRICK	mherrick@gibsondunn.com
GPI-OCS, LLC	Attn Zachary McKay	zmckay@jw.com; slawrence@graniteprop.com
GPI-OCS, LLC	Granite Properties	slawrence@graniteprop.com
HARRISON RAINEY INC	JOHN HARRISON	sales@fordsystem.com
JEMPS MANAGEMENT		jashe@vanguardcleaning.com; gdejesus@vanguardcleaning.com
Kean Miller LLP	Chris Caplinger	chris.caplinger@keanmiller.com
Kean Miller LLP	Louise Babin	louise.babin@keanmiller.com
KORE Wireless Inc, A KORE Wireless Group Company	Corinna Hardy	chardy@korewireless.com
LetzChat, Inc.		ar@letzchat.com; jordan@letzchat.com
Lohmeyer, JoAnne		Email on File
MILLERS HOUSEWARES INC		millerslynbrook@aol.com
NST Battery LLC		chris.orf@batteriesplus.com
NUMERA SYSTEMS US INC.		accountsreceivable@numera.com
PJG Enterprises Inc.		kgroves@vanguardcleaning.com; gdejesus@vanguardcleaning.com
PJSJ ENTERPRISES INC		rlegoff@vanguardcleaning.com; gdejesus@vanguardcleaning.com
PRINTING INC DBA JWH ASSOCIATES		JWHASSC@aol.com
QUALITY SERVICES LLC	QUALITY SERVICES LLC DBA VANGUARD CLEANING SYSTEMS OF NEPA	accounting@vanguardcleaning-nepa.com; ggressler@vanguardcleaning-pa.com; accounting@vanguardcleaning-pa.com
REDICO Management, Inc.	Attn Senior Property Manager	jstevens@redico.com; chaboian@redico.com
REDICO Management, Inc.	RNSI City Place Owner LLC	jstevens@redico.com
SOURCEPASS, LLC		ebill@sourcepass.com; tanairy.sandoval@sourcepass.com
Stone Kalfus LLP	Katie Arabis	katie.arabis@stonekalfus.com
Tech Service Today LLC	Craig Knowles	craig.knowles@techservicetoday.com
Wick Shopping Plaza Associates, L.L.C.	Attn Thomas Onder, Esq.	tonder@stark-stark.com

Exhibit H

Exhibit H

Twenty-Eighth Omnibus Objection Claimant Service List

Served via First Class Mail

CreditorName	Address1	City	State	Zip
Lohmeyer, JoAnne	Address on File			

Exhibit I

Exhibit I

Twenty-Ninth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Alachua County Fire/Rescue	Kathy Niederloh	kfniederloh@alachuacounty.us
Chavez, Antonio	Trini Trevino	Email on File
Chavez, Antonio		Email on File
Collins, Shelia Renee	Shelia R. Collins	Email on File
Emanuel Carton		Email on File
Falck Mobile Health Corp		nicollette.loo@falck.com
Ferro, Victoria	Victoria Holt	Email on File
Jason Jon douglas St Amand		Email on File
JOACHIM-PLATTIN AMBULANCE DISTRICT	JEFFREY ROORDA	jroorda@proclaimsbilling.com
Skelly, Cheryl		Email on File
St Amand, Jayson	Jason Jon Douglas St Amand	Email on File

Exhibit J

Exhibit J

Twenty-Ninth Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Chavez, Antonio	Trini Trevino	Address on File			
Chavez, Antonio		Address on File			
Collins, Shelia Renee		Address on File			

Exhibit K

Exhibit K

Thirtieth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
BRAR, JASPREET		Email on File
Briana Richburg		Email on File
Busby, LaTonya		Email on File
COLYER, JOYCE		Email on File
DO, DONALD THANH		Email on File
Fiber, Charles J		Email on File
HAMMOND, SHERRIE S		Email on File
HORN, STELLA	Sandra E. Davis	sdavis@damdpc.com
HORN, STELLA		Email on File
Inter City Fire Protection District		emerry@dmbsinc.org
Johnson, Cinda		Email on File
LIEBHAUSER, JOHN		Email on File
MILLER, WANITA		Email on File
Moiseyeva, Valentina		Email on File
Neveu, Selina Denise	Selina D. Neveu	Email on File
Neveu, Selina Denise		Email on File
RIMER, HEATHER		Email on File

Exhibit L

Exhibit L

Thirtieth Omnibus Objection Claimant Service List

Served via First Class Mail

CreditorName	Address1	Address2	City	State	Zip
Jones, Eva	Address on File				

Exhibit M

Exhibit M

Thirty-First Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
ADKINS, ALBERT		Email on File
Administrative Services Cooperative, Inc.	Young & Chic LLP	myoung@youngchicllp.com
Administrative Services Cooperative, Inc.		bhristev@layellowcab.com
Arkansas Department of Finance and Administration	Revenue Legal Counsel	michelle.baker@dfa.arkansas.gov
AuditBoard, Inc.		accountsreceivable@auditboard.com
BANKS, DAREN		Email on File
Becklar	c/o Landon Raiford	lraiford7@gmail.com
Behnken, Jr., John Frederick		Email on File
BLAIN, MARSHA		Email on File
Butler, Sandra		Email on File
CAROUSEL FARM EDUCATIONAL CENTER		DANLAGROTTE@GMAIL.COM
Cheboygan County		Email on File
CLIMAX TECHNOLOGY CO LTD	Enlighten Law Group	kt@enlightenlaw.com; alisa@enlightenlaw.com
CLIMAX TECHNOLOGY CO LTD		ANNIELIAO@CLIMAX.COM.TW; monicalin@climax.com.tw; alisa@enlightenlaw.com
CNC-ACCESS Inc. a/k/a Community Alternatives Virginia, Inc.	Phillip A. Martin	pmartin@fmdlegal.com
CNC-ACCESS, Inc. a/k/a Community Alternatives Virginia, Inc.		mlandis@rescare.com
COX, LEWIS W		Email on File
CSA Service Solutions, LLC dba EMSAR		csa.ar@emsar.com
CT Corporation	Attn Bankruptcy SOP	fss-bankruptcy@wolterskluwer.com
Daniel Lozano		Email on File
Deborah Gonzales		Email on File
Diane Sacks		Email on File
DOOLEY, JUSTIN		Email on File
DOUGLAS, JOSHUA		Email on File
DURICARE INC		cbai@complicore.co
Exell Water and Coffee, Inc.		admin@exellcompanies.com; bbrewer@exellcompanies.com
Friendly Medical Transportation	Attn Zachary McKay	zmckay@jw.com; Chris.Chamblee@friendlymedicaltransportation.com
Friendly Medical Transportation		nawalt@friendlymedicaltransport.com
GAUNA, BARBARA	BARBARA D GAUNA	Email on File
GISER, STANLEY		Email on File
Giuliani, Casey		Email on File
GONZALES, JEANETTE LYNN		Email on File
Google LLC	Attn Jeremiah Vandermark	vandermarkjj@whiteandwilliams.com
GRACE, GWENDOLYN		Email on File
GRAY, CARA H		Email on File
H J Medical Supplies, Inc	Joseph McGovern	jmcgovern@hjmedicalsupplies.com
Harmony Harriman		Email on File
Instant Care, Inc		art.olguin@myinstantcare.com
JL GEISLER SIGN COMPANY	dba NATIONAL BRANDING	corinne@jlgeisler.com
JUENEMANN, JENNIFER		Email on File
KOEHL, MARIANNE		Email on File
LAMSON, ARLENE		Email on File
MEDLEY, TERESA		Email on File
MEDREADY, INC.		sales@medready.net
Miriam Rosenblum		Email on File
Nixon Peabody LLP	Diane Gerardi	dgerardi@nixonpeabody.com
Nixon Peabody LLP	Stephen Jones	sjones@nixonpeabody.com
Northeast Treatment Centers	Tara Young	tara.young@net-centers.org
Ohio Department of Taxation	Bankruptcy Division	bankruptcydivision@tax.ohio.gov; Katherine.Zucca@tax.ohio.gov

Exhibit M

Thirty-First Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
POLSINELLI PC	ATTN ACCOUNTING/BANKRUPTCY DEPT	ACCOUNTINGRECEIVABLES@POLSINELLI.COM
Polsinelli PC	Attn Scott A. Berdan, Esq.	SBerdan@Polsinelli.com
RONALD MCDONALD, RMHCENC	BETH ANNE ATKINS	bethanne@rmhcenc.org
ROY L STREET/CAPITOL CAB CO	Capitol Cab Co	linda@renocab.com
ROY L STREET/CAPITOL CAB CO	ROBIN STREET	Email on File
Scotia Livery Inc		pgibbsjr23@gmail.com
SIGNATURE STAFF RESOURCES LLC	AMBER KUNDMUELLER	akundmueller@signaturebackoffice.com
SKYLINE CLEANING LLC		SKYLINECLEANINGLLC@YAHOO.COM; ajscommercialcleaning@outlook.com
Steven Schrankel		Email on File
Tech Mahindra Americas Inc		joann.beane@techmahindra.com
Tennessee Department of Revenue	c/o Attorney General	TDOR.Bankruptcy@tn.gov; steve.butler@ag.tn.gov
Tennessee Department of Revenue	Sherry Grubbs	sherry.grubbs@tn.gov
Tennessee Department of Revenue	TDOR	TDOR.Bankruptcy@tn.gov
US COFFEE		info@uscoffee.com
WILLOWOOD PARK LLC	Susan Mezger	smezger@gcir.com
WILLOWOOD PARK LLC		tgreenwood@gcir.com; tom@gcir.com
WRIKE, INC		accountsreceivable@team.wrike.com

Exhibit N

Exhibit N

Thirty-First Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Becklar	c/o Ray Winzler, CFO	P.O. Box 669437		Dallas	TX	75266
BELLEVILLE, NYLE		Address on File				
Bennett, Arlene	Arlene Cain Bennett	Address on File				
Bennett, Arlene		Address on File				
CNC-ACCESS Inc. a/k/a Community Alternatives Virginia, Inc.	CNC-ACCESS Inc.	805 N Whittington Pkwy	Ste 400	Louisville	KY	40222
Google LLC		Dept. 33654	PO Box 3900	San Francisco	CA	94139
LACOUR, BIANCA		Address on File				
Ohio Department of Taxation	Attorney General of the State of Ohio	Collections Enforcement Section	30 E. Broad St., 14th Floor	Columbus	OH	43215
SANCHEZ, GLORIA	Silvia Sanchez Pineda	Address on File				
SANCHEZ, GLORIA		Address on File				
Tech Mahindra Americas Inc		5850 Granite Parkway, Suite 1200		Plano	TX	75024
Tech Mahindra Americas Inc.		9777 Pyramid Ct Suite 160		Englewood	CO	80112
Wrike, Inc		PO Box 738154		Dallas	TX	75373-8154

Exhibit O

Exhibit O

Thirty-Second Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
ANSPACH, CHRISTOPHER		Email on File
Armstrong, Alysshia M		Email on File
BACA, ELIZABETH		Email on File
BD Health Services	Andre Walters	awalters@bdihs.com
BONG, KENNETH		Email on File
Bowling, Kathy Sue		Email on File
Bragg, Joan		Email on File
BROCK, BRITTNEY L.		Email on File
BROWN, ANNIE L		Email on File
Candice Tyree		Email on File
CROUSE, MATTHEW		Email on File
CRUZ, JULIA V		Email on File
Denney, Ryan P		Email on File
DONKOR, PATRICIA		Email on File
Drumgold, Naomi		Email on File
Ellis, Jenine	Jenine Ellis	Email on File
Ellis, Jenine		Email on File
EPISKOPOSYAN, VARDAN		Email on File
FERKO, LORETTA		Email on File
Finkelstein, Raphael P		Email on File
FREEMAN, MELECIA		Email on File
Gooden, Latasha	Latasha Gooden	Email on File
GRAY, CARA H		Email on File
HALPERN, BRUCE		Email on File
HAYNES, THOMAS		Email on File
Hicks, Tayla	Tayla Hicks	Email on File
HOWER, SHAWNA		Email on File
JACKSON, ALEXIS		Email on File
Jennifer Quaglio		Email on File
Kiamesha Newsom		Email on File
Lacroix, Sara Georgine		Email on File
Layport, Aimee		Email on File
Lewis, Dwayne		Email on File
Malone, Tambra		Email on File
Mark P Donaldson		Email on File
MCCLELLAN, KAYLA		Email on File
NEWTON, MICHAELA		Email on File
OTOOLE, BRIAN		Email on File
Rodriguez Camacho, Samely		Email on File
RODRIGUEZ, JAZMIN A		Email on File
RONALD MCDONALD HOUSE CHARITIES OF COLUMBIA		tracey.tucker@rmhcofcolumbia.org
Rutan, Robin	Robin Catherine Rutan	Email on File
Rutan, Robin		Email on File
SADLO, VIVIEN		Email on File
SCHETROMPF, KEVIN		Email on File
Schrankel, Steven		Email on File
Sharonda Green		Email on File
Shelah Harper	c/o Nadia Hewka	Email on File
Shelah Harper		Email on File
Shereen Raza		Email on File

Exhibit O

Thirty-Second Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
SHERLENE STEVENS	C/O THE SHERLENE BRAND	Email on File
SHERLOCK, DIANE		Email on File
Shirley Matamoros	Carlos Villaba	Email on File
Tanya Dove		Email on File
Timarky, Enileska		Email on File
TOMBERLIN, TRACY		Email on File
Victor Calbert		Email on File
White, Danielle		Email on File
Wilson, Ivory	Ivory L. Wilson	Email on File
Wilson, Ivory		Email on File
YOUNG, ARETTA		Email on File

Exhibit P

Exhibit P

Thirty-Second Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Cormier, Pamela		Address on File			
Fossett, Betty		Address on File			
Hill, John		Address on File			
Rutan, Robin	Robin Catherine Rutan	Address on File			
Rutan, Robin		Address on File			

Exhibit Q

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)

NOTICE OF REORGANIZED DEBTORS'
TWENTY-SIXTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf was filed after the applicable bar date and should therefore be disallowed and expunged.

[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 Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow and expunge your Claim(s) in their entirety on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026**, **at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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-SIXTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO 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 DISALLOWED WITHOUT A HEARING.

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 the 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***") disallowing the claims listed on **Schedule 1** (the "***Late-Filed Claims***") to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Bar Date (as defined below).

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 of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (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 Late-Filed Claims (each 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.

---

[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.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 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 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 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

[3] Docket No. 1055.

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 "***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 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 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*

[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].

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 Late-Filed Claims along with this Objection.

13. 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]

---

[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.").

[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.").

14. 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 LATE-FILED CLAIMS

15. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

16. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Twenty-Sixth Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

(a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Bar Date; and

(b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Bar Date.

17. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

18. 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 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." FED. R. BANKR. P. 3007(d). This includes objections on the grounds that claims should be disallowed because they "were not timely filed." FED. R. BANKR. P. 3007(d)(2)(D).

19. 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)).

20. Here, the Court established, pursuant to the Bar Date Order, the Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Bar Date Order. The Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite "in order to share in the Debtors' estates," Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim "shall not be treated as a creditor with respect to such claim for purposes of voting and distribution." *Id.*

at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Bar Date, and, thus, are subject to disallowance under the express terms of the Bar Date Order.

21. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

22. 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 of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

23. 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

24. 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.

25. 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-SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Twenty-Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Local Bankruptcy 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 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

[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 the 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.

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 LATE-FILED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Bar Date; and

(b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Bar Date.

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-SIXTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing the Late-Filed Claims in their entirety as 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

[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 the 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.

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 Late-Filed Claim listed on **Schedule 1** is disallowed and expunged in its entirety.

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 Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed 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; (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).

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

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Nature	Asserted Claim Amount
1	2M Enterprise LLC	ModivCare Inc.	2446	02-10-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $19,389.18 $19,389.18
2	AMBULNZ NY, LLC	ModivCare Solutions, LLC	2461	02-12-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
3	B and S Properties	ModivCare Inc.	1846	10/8/2025	General Unsecured Priority Secured Admin Priority Total	$14,911.50 $0.00 $0.00 $0.00 $14,911.50
4	Bober, Chris	ModivCare Inc.	2554	10/12/2026	General Unsecured Priority Secured Admin Priority Total	Amount Not Stated
5	Bandwidth Inc.	ModivCare Solutions, LLC	1893	10-13-25	General Unsecured Priority Secured Admin Priority Total	$98,501.13 $0.00 $0.00 $0.00 $98,501.13
6	Careficient, Inc.	Multicultural Home Care Inc.	2523	04-24-26	General Unsecured Priority Secured Admin Priority Total	$534.45 $0.00 $0.00 $0.00 $534.45
7	CAROLINAS MEDICAL CENTER	ModivCare Inc.	2533	05-22-26	General Unsecured Priority Secured Admin Priority Total	$90,544.17 $0.00 $0.00 $0.00 $90,544.17
8	Casto, Casey	ModivCare Inc.	2500	02-21-26	General Unsecured Priority Secured Admin Priority Total	$654.00 $0.00 $0.00 $0.00 $654.00
9	Clallam County Tax Collector	Higi SH LLC	2505	02-24-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $17.45 $0.00 $17.45
10	Cole, Angela	ModivCare Inc.	2152	12-01-25	General Unsecured Priority Secured Admin Priority Total	$100,000.00 $0.00 $0.00 $0.00 $100,000.00
11	Commonwealth Edison Company	ModivCare Inc.	2525	04-27-26	General Unsecured Priority Secured Admin Priority Total	$1,284.46 $0.00 $0.00 $0.00 $1,284.46
12	Compass Group USA dba Canteen Refreshment Services	ModivCare Inc.	2504	02-25-26	General Unsecured Priority Secured Admin Priority Total	$2,389.23 $0.00 $0.00 $0.00 $2,389.23
13	Continental Casualty Company	ModivCare Inc.	1830	10-06-25	General Unsecured Priority Secured Admin Priority Total	$167,090.00 $0.00 $0.00 $0.00 $167,090.00
14	Daehnke, Cynthia	ModivCare Inc.	2503	02-17-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
15	Dickens, Nasir	ModivCare Inc.	2265	01-14-26	General Unsecured Priority Secured Admin Priority Total	$2,454.00 $0.00 $0.00 $0.00 $2,454.00
16	Dickens, Nasir	ModivCare Inc.	2522	04-05-26	General Unsecured Priority Secured Admin Priority Total	$2,454.00 $0.00 $0.00 $0.00 $2,454.00
17	DLR Management Group, LLC d/b/a Contigo Medical Transportation Services	ModivCare Inc.	2532	05-21-26	General Unsecured Priority Secured Admin Priority Total	$230,927.50 $0.00 $0.00 $0.00 $230,927.50
18	Downs, Ella	ModivCare Inc.	2453	02-10-26	General Unsecured Priority Secured Admin Priority Total	$20,000.00 $0.00 $0.00 $0.00 $20,000.00
19	Fears, Brittany	ModivCare Inc.	2530	05-05-26	General Unsecured Priority Secured Admin Priority Total	$2,391.20 $0.00 $0.00 $0.00 $2,391.20
20	Gadaire, Lisa	ModivCare Inc.	2520	03-30-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $15,870.00 $15,870.00

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Nature	Asserted Claim Amount
21	Garcia, Eileen	ModivCare Inc.	2170	12-08-25	General Unsecured Priority Secured Admin Priority Total	$650.00 $20,950.00 $0.00 $0.00 $21,600.00
22	Hagopian, Dorothy	ModivCare Inc.	2498	02-17-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
23	Hagopian, Dorothy R.	ModivCare Inc.	2514	03-13-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
24	Harper Law Firm	ModivCare Inc.	2516	3/20/2026	General Unsecured Priority Secured Admin Priority Total	$5,000,000.00 $0.00 $0.00 $0.00 $5,000,000.00
25	Harton, ArQuesha L	ModivCare Solutions, LLC	2456	02-09-26	General Unsecured Priority Secured Admin Priority Total	$21,000.00 $0.00 $0.00 $14,000.00 $35,000.00
26	HealthCare Research LLC	ModivCare Inc.	2455	02-12-26	General Unsecured Priority Secured Admin Priority Total	$9,677.42 $0.00 $0.00 $0.00 $9,677.42
27	HealthSpring, Inc.	ModivCare Solutions, LLC	2512	03-17-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
28	James, Shandy	ModivCare Solutions, LLC	2510	03-12-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
29	Knepper, Michele	ModivCare Inc.	2454	02-10-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
30	Konica Minolta Business Solutions, Inc.	ModivCare Inc.	2443	02-09-26	General Unsecured Priority Secured Admin Priority Total	$22,838.13 $0.00 $0.00 $0.00 $22,838.13
31	Lakhiaminh, Brady	ModivCare Inc.	2457	02-11-26	General Unsecured Priority Secured Admin Priority Total	$15,000.00 $0.00 $0.00 $0.00 $15,000.00
32	Leverette, Thomas	ModivCare Solutions, LLC	2061	11-05-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $807.80 $807.80
33	Leverette, Thomas	ModivCare Inc.	2268	01-15-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $807.00 $807.00
34	Llano, Candice	ModivCare Inc.	2508	03-08-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
35	Massimi, Laura	ModivCare Solutions, LLC	1910	10/7/2025	General Unsecured Priority Secured Admin Priority Total	UNLIQUIDATED $0.00 $0.00 $0.00 UNLIQUIDATED
36	Mingoia, Mary	ModivCare Inc.	2506	02-25-26	General Unsecured Priority Secured Admin Priority Total	$818.65 $0.00 $0.00 $0.00 $818.65
37	Moodys Investors Service Inc	ModivCare Inc.	1804	10-07-25	General Unsecured Priority Secured Admin Priority Total	$130,325.37 $0.00 $0.00 $0.00 $130,325.37
38	Neiswender, Barbara E	ModivCare Inc.	2002	10-27-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
39	Padilla, Stephanie	ModivCare Inc.	2494	02-17-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
40	PAVONE LLC	ModivCare Solutions, LLC	1909	10-14-25	General Unsecured Priority Secured Admin Priority Total	$70,000.00 $0.00 $0.00 $0.00 $70,000.00

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Asserted Claim Nature	Asserted Claim Amount
41	Petty, Kimberly	ModivCare Inc.	2501	02-22-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
42	Phillips, Christina	ModivCare Inc.	2539	08-08-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
43	PRN Ambulance LLC	ModivCare Inc.	2527	04-29-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $5,727.00 $5,727.00
44	Ragland, Michael Shane	ModivCare Inc.	2015	10-28-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $115,626.26 $0.00 $0.00 $115,626.26
45	Riddle, Kristin Lynn	ModivCare Inc.	2513	03-18-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $1,120.00 $1,120.00
46	Rodriguez, Stacey	ModivCare Inc.	2048	11-04-25	General Unsecured Priority Secured Admin Priority Total	$0.00 $45,300.00 $15,000.00 $15,000.00 $75,300.00
47	Rowe, Jennifer H	ModivCare Inc.	2517	03-28-26	General Unsecured Priority Secured Admin Priority Total	$500.00 $0.00 $0.00 $0.00 $500.00
48	Silva, Dymondlee	ModivCare Inc.	2528	04-30-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $5,000.00 $5,000.00
49	Smith, Andrea	ModivCare Solutions, LLC	2449	02-10-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
50	Sterling, A First Advantage Company.	Care Finders Total Care LLC	2531	05-07-26	General Unsecured Priority Secured Admin Priority Total	$31,416.90 $0.00 $0.00 $0.00 $31,416.90
51	The Harper Law Firm	ModivCare Inc.	2515	3/20/2026	General Unsecured Priority Secured Admin Priority Total	$5,000,000.00 $0.00 $0.00 $0.00 $5,000,000.00
52	Thomas, Jacqueline	ModivCare Inc.	1856	10-09-25	General Unsecured Priority Secured Admin Priority Total	$150,000.00 $0.00 $0.00 $0.00 $150,000.00
53	Tomlin, Beulah	ModivCare Inc.	2436	02-09-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
54	Vanicor, Justin	ModivCare Inc.	2509	03-10-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $11,600.90 $0.00 $0.00 $11,600.90
55	Warren, Patrick	ModivCare Solutions, LLC	2511	03-14-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
56	Wilson, Eric	ModivCare Inc.	2519	04-01-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
57	Woodley, Tori	ModivCare Inc.	2055	11-05-25	General Unsecured Priority Secured Admin Priority Total	$349.74 $0.00 $0.00 $0.00 $349.74
58	Woodley, Tori	ModivCare Inc.	2323	01-28-26	General Unsecured Priority Secured Admin Priority Total	$349.79 $0.00 $0.00 $0.00 $349.79
59	Zabawa, Loriann B	ModivCare Inc.	2437	02-09-26	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit R

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)

NOTICE OF REORGANIZED DEBTORS'
TWENTY-SEVENTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because it fails to include documentation sufficient to substantiate the asserted liability or amount and, based on their books and records, the Reorganized Debtors are not aware of any liability on account of the Claim.

[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 Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026 at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow and expunge your Claim(s) in their entirety on the grounds set forth in the Omnibus Objection. The proposed order also provides that affected claimants will not be entitled to distributions or recoveries on account of such Claims, including from insurance proceeds, and will be barred from asserting such Claims against the Debtors, the Reorganized Debtors, or their Estates, as more fully set forth in the proposed order.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026, at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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-SEVENTH OMNIBUS OBJECTION
TO CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO 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 DISALLOWED WITHOUT A HEARING.

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***"), disallowing and expunging the claims listed on **Schedule 1** to the Proposed Order (the "***Insufficient Documentation Claims***") in their entirety[3] because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of each such Insufficient Documentation Claim.

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 Insufficient Documentation 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

---

[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.

[3] The Proposed Order provides that no Claimant that is the Holder of an Insufficient Documentation Claim shall be entitled to any distribution under the Plan or share in any recovery from the Reorganized Debtors, the Estates, or their respective Assets and property (including any proceeds of any insurance policy of the Debtors or the Reorganized Debtors that may provide coverage for any Claim or Cause of Action implicated by such Insufficient Documentation Claim) on account of such Insufficient Documentation Claim.

Reorganized Debtors' estates based on the filing of a Proof of Claim, the holders of the Insufficient Documentation Claims (each, 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) and 502 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 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[4] which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

[4] 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, 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.[5] Also, as certified at Docket No. 142, in accordance with the Bar Date Order, the 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 Debtors also listed numerous claims in their Schedules[6] (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the "***Claims***"), some of which were satisfied under the authority granted to the 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 Claims and Noticing Agent (the "***Claims Register***").[7]

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 appended thereto as Exhibit 1 (the "***Objection Procedures***") for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases. The

---

[5] "***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].

[6] 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.

[7] 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.").

Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Insufficient Documentation Claims along with this Objection.

13. 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 by an additional ninety (90) days through and including December 28, 2026, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE INSUFFICIENT DOCUMENTATION CLAIMS

14. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms allowed them to identify the Insufficient Documentation Claims. This Objection seeks to disallow and expunge the Insufficient Documentation Claims in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of each such Insufficient Documentation Claim.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Twenty-Seventh Omnibus Objection to Certain Claims*, attached hereto as **Exhibit A**, based on their review of the Claims Register and applicable Claim Forms, the Reorganized Debtors and their advisors identified each Insufficient Documentation Claim listed on **Schedule 1** to the Proposed Order as failing to provide documentation sufficient to substantiate the asserted liability or amount. To identify the Insufficient Documentation Claims, the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any liability on account of each Insufficient Documentation Claim.

16. The Reorganized Debtors hereby request that the Insufficient Documentation Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

17. 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 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." FED. R. BANKR. P. 3007(d). This includes objections on the grounds that claims should be disallowed because they "were presented in a form that does not comply with applicable rules and the objection states that the objector is therefore unable to determine a claim's validity . . . ". FED. R. BANKR. P. 3007(d)(2)(F).

18. 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)).

19. Here, the Bar Date Order expressly provides that 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. As set forth above, each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount. To the extent a Claimant included a statement concerning the absence or unavailability of supporting documentation, such statement does not, standing alone, substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim. Furthermore, based on the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of the Insufficient Documentation Claims. Thus, the Insufficient Documentation Claims are subject to disallowance.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

RESERVATION OF RIGHTS

21. 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 this Objection be dismissed or overruled with respect to any of the Insufficient Documentation Claims, the Reorganized Debtors reserve the right to object to each of the Insufficient Documentation Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. 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

23. 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.

24. 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-SEVENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Twenty-Seventh Omnibus Objection to Certain Claims* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

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 twenty 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 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

[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.

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 INSUFFICIENT DOCUMENTATION CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Insufficient Documentation Claims and hereby seek to disallow them in their entirety.

5. The Insufficient Documentation Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any liability on account of each Insufficient Documentation Claim.

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-SEVENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Insufficient Documentation Claims in their entirety as 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

[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.

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 Insufficient Documentation Claim listed on **Schedule 1** is disallowed and expunged in its entirety. No Claimant that is the Holder of an Insufficient Documentation Claim listed on Schedule 1 shall be entitled to any distribution under the Plan on account of such Insufficient Documentation Claim, or share in any recovery from the Reorganized Debtors, the Estates, or their respective Assets and property (including any proceeds of any insurance policy of the Debtors or the Reorganized Debtors that may provide coverage for any Claim or Cause of Action asserted in or implicated by such Insufficient Documentation Claim) on account of such Insufficient Documentation Claim. Each such Claimant is forever barred, estopped, and enjoined from asserting such Insufficient Documentation Claim against the Debtors, the Reorganized Debtors, or the Estates. Such Insufficient Documentation Claim shall not be enforceable against the Debtors, the Reorganized Debtors, the Estates, or their respective Assets and property, and remains subject to the permanent injunction set forth in Article X, Section 10.5 of the Plan.

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

6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Insufficient Documentation 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).

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

INSUFFICIENT DOCUMENTATION CLAIMS

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	COGHILL, LISA	ModivCare Inc.	336	09/16/2025	General Unsecured	UNLIQUIDATED
					Priority	—
					Secured	—
					Admin Priority	—
					Total	UNLIQUIDATED
2	COGHILL, LISA	ModivCare Inc.	339	09/16/2025	General Unsecured	UNLIQUIDATED
					Priority	—
					Secured	—
					Admin Priority	—
					Total	UNLIQUIDATED
3	COLLINS, RONNIE	ModivCare Inc.	735	09/24/2025	General Unsecured	—
					Priority	$3,500,000.00
					Secured	—
					Admin Priority	—
					Total	$3,500,000.00
4	El Idrissi, Lalla Nabila Azallali	ModivCare Inc.	1718	10/3/2025	General Unsecured	UNLIQUIDATED
					Priority	—
					Secured	—
					Admin Priority	—
					Total	UNLIQUIDATED
5	PINSON, RONALD	ModivCare Inc.	1426	10/01/2025	General Unsecured	—
					Priority	—
					Secured	$5,000.00
					Admin Priority	—
					Total	5,000.00
6	ROBINSON, NICK	ModivCare Solutions, LLC	322	09/16/2025	General Unsecured	$100,000.00
					Priority	—
					Secured	—
					Admin Priority	—
					Total	$100,000.00
7	WILLIAMS, SHERETTA DENISE	ModivCare Inc.	794	09/26/2025	General Unsecured	$35,000.00
					Priority	—
					Secured	—
					Admin Priority	—
					Total	$35,000.00

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit S

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)

NOTICE OF REORGANIZED DEBTORS'
TWENTY-EIGHTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to reduce or disallow the claim you filed in this 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 notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be reduced or disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the schedules to the Omnibus Objection, the Reorganized Debtors believe that the Claims listed on **Schedule 1** assert amounts exceeding what the Reorganized Debtors owe based on their books and records and claims reconciliation. The Reorganized Debtors seek to reduce and allow those Claims in the proposed amounts shown on **Schedule 1** and disallow and expunge the excess amounts. The Reorganized Debtors seek to

[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 Omnibus Objection.

disallow and expunge the Claims listed on **Schedule 2** in their entirety because the Reorganized Debtors are not liable for the asserted amounts.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be reduced or disallowed and expunged, as applicable, without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors seek to reduce and allow the Claims listed on **Schedule 1** in the proposed allowed amounts shown on that schedule, with any excess amounts disallowed and expunged. The Reorganized Debtors also seek to disallow and expunge the Claims listed on **Schedule 2** in their entirety because the Reorganized Debtors are not liable for the asserted amounts.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026**, **at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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**

#	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**

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit T

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)

NOTICE OF REORGANIZED DEBTORS'
TWENTY-NINTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is inconsistent with the Reorganized Debtors' books and records and should therefore be disallowed and expunged.

[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 Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow and expunge your Claim(s) in their entirety on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026**, **at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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-NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO 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 DISALLOWED WITHOUT A HEARING.

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***"), disallowing and expunging the claims listed on **Schedule 1** to the Proposed Order because such claims are inconsistent with the Reorganized Debtors' books and records (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 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.

---

[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.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 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 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 Thereof; and (C) Granting Related Relief* [Docket No. 66] (the "***Bar Date Order***") setting, *inter alia*, (i) October 1, 2025, 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

[3] Docket No. 1055.

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 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*

[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].

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.

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). The Additional Grounds, include, *inter alia*, Claims that "are inconsistent with the Reorganized Debtors' books and records." Objection Procedures, ¶ 1(a).

---

[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.").

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, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE DISPUTED CLAIMS

16. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms and their books and records allowed them to identify the Disputed Claims, all of which are inconsistent with the Reorganized Debtors' books and records which reflect that no amount is owed on account of each of the Disputed Claims.

17. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Twenty-Ninth Omnibus Objection to Certain Claims*, attached hereto as **Exhibit A**, based on their review of the Claims Register and applicable Claim Forms, the Reorganized Debtors and their advisors identified each of the Disputed Claims after they:

(a) reviewed the Claims Register and applicable Claim Forms, including any attachments, to determine the asserted amount, classification, and stated basis for each Claim; and

(b) compared the Claims with the Reorganized Debtors' books and records and determined, based on such review, that the Disputed Claims are inconsistent with the Reorganized Debtors' books and records.

[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.").

18. Accordingly, the Reorganized Debtors hereby request that the Disputed Claims be disallowed in their entirety and expunged.

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).

20. Bankruptcy Rule 3007 provides certain grounds upon which objections to more than one claim may be joined in a single objection, and Bankruptcy Rule 3007(c) permits the Court to authorize omnibus objections on additional grounds. The Objection Procedures expressly authorize the Reorganized Debtors to file omnibus objections to Claims that are inconsistent with the Reorganized Debtors' books and records, seek recovery of amounts for which the Reorganized Debtors are not liable, are disallowed pursuant to the Plan or the Confirmation Order, or fail to sufficiently specify the basis for the Claim. *See* Objection Procedures ¶¶ 1(a), (c), (h)-(i).

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)).

22. For the reasons set forth below the Disputed Claims should be disallowed and expunged in their entirety.

I. The Disputed Claims Should Be Disallowed Because They Are Inconsistent with the Reorganized Debtors' Books and Records.

23. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file omnibus objections to Claims that "are inconsistent with the Reorganized Debtors' books and records." Omnibus Objection Procedures Order, ¶ 1(a). Each of the Disputed Claims asserts liabilities or amounts that are inconsistent with the Reorganized Debtors' books and records. More specifically, based on the Reorganized Debtors' books and records the Reorganized Debtors do not owe any amount on account of the Disputed Claims.

24. Accordingly, the Disputed Claims should be disallowed and expunged in their entirety.

RESERVATION OF RIGHTS

25. 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 the single ground of objection set forth herein be dismissed or overruled as to one or more of the Disputed Claims, the Reorganized Debtors reserve the right to object to each of the Disputed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

26. 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

27. 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.

28. 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-NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Twenty-Ninth Omnibus Objection to Certain Claims (Invalid Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

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 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

[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 otherwise defined herein have the meanings ascribed to them in the Objection.

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 empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified the Disputed Claims which they seek the disallowance of in their entirety.

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

(a) reviewed the Claims Register and the applicable Claim Forms, including any attachments, to determine the asserted amount, classification, and stated basis for each Claim; and

(b) compared the Claims with the Reorganized Debtors' books and records and determined, based on such review, that the Disputed Claims are inconsistent with the Reorganized Debtors' books and records.

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-NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Disputed Claims set forth on **Schedule 1** hereto 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 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

[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.

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 Disputed Claims listed on **Schedule 1** is disallowed and expunged in its entirety.

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 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.

6. 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).

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

(DISPUTED 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	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	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

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit U

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)

NOTICE OF REORGANIZED DEBTORS'
THIRTIETH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf fails to sufficiently specify the legal or factual basis for the asserted liability and should therefore be disallowed and expunged.

[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 Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow and expunge your Claim(s) in their entirety on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026**, **at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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' THIRTIETH OMNIBUS
OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO 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 DISALLOWED WITHOUT A HEARING.

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***"), disallowing and expunging the claims listed on **Schedule 1** to the Proposed Order because such claims fail to sufficiently specify the legal or factual basis for the asserted liability (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 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.

---

[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.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 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 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 Thereof; and (C) Granting Related Relief* [Docket No. 66] (the "***Bar Date Order***") setting, *inter alia*, (i) October 1, 2025, 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

[3] Docket No. 1055.

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 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*

[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].

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.

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). The Additional Grounds, include, *inter alia*, Claims that "fail to sufficiently specify the basis for the Claim …." Objection Procedures, ¶ 1(h).

---

[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.").

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, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE DISPUTED CLAIMS

16. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms allowed them to identify the Disputed Claims, each of which fails to identify with sufficient specificity the legal or factual basis for the asserted liability and does not provide sufficient information for the Reorganized Debtors to determine the nature or basis of the alleged obligation.

17. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Thirtieth Omnibus Objection to Certain Claims*, attached hereto as **Exhibit A**, based on their review of the Claims Register and applicable Claim Forms, the Reorganized Debtors and their advisors identified each Disputed Claim after they:

(a) reviewed the Claims Register and applicable Claim Forms, including any attachments, to determine the asserted amount, classification, and stated basis for each Claim; and

(b) reviewed the information included in or with each Claim Form and determined that each of the Disputed Claims fails to sufficiently specify the legal or factual basis for the asserted liability.

[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.").

18. Accordingly, the Reorganized Debtors hereby request that the Disputed Claims be disallowed in their entirety and expunged.

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).

20. Bankruptcy Rule 3007 provides certain grounds upon which objections to more than one claim may be joined in a single objection, and Bankruptcy Rule 3007(c) permits the Court to authorize omnibus objections on additional grounds. The Objection Procedures expressly authorize the Reorganized Debtors to file omnibus objections to Claims that are inconsistent with the Reorganized Debtors' books and records, seek recovery of amounts for which the Reorganized Debtors are not liable, are disallowed pursuant to the Plan or the Confirmation Order, or fail to sufficiently specify the basis for the Claim. *See* Objection Procedures ¶¶ 1(a), (c), (h)-(i).

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)).

22. For the reasons set forth below the Disputed Claims should be disallowed and expunged in their entirety.

I. The Insufficient Basis Claims Should Be Disallowed Because They Fail to Sufficiently Specify the Legal and Factual Basis for the Asserted Liability.

23. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file omnibus objections to Claims that "fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor". Objection Procedures, ¶ 1(h). Moreover, the Bar Date Order requires each filed claim to "set forth with specificity the legal and factual basis for the alleged claim" and to "include supporting documentation or an explanation as to why such documentation is not available." Bar Date Order, ¶ 7. These requirements mirror the obligations imposed by Bankruptcy Rule 3001, which conditions a claim's prima facie validity on the claimant's provision of sufficient information and documentation to substantiate the claim. Claims filed without the requisite factual detail fail to comply with the Bar Date Order and do not attain prima facie evidentiary status under Bankruptcy Rule 3001(f).

24. Each of the Disputed Claims fails to identify with sufficient specificity the transaction, agreement, service, event, or other basis for the obligation on account of which such Claimants assert a Claim. The Disputed Claims do not contain this necessary information and the Reorganized Debtors do not believe any amounts are owed on account of the Disputed Claims.

25. Accordingly, the Disputed Claims should be disallowed and expunged in their entirety.

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 of the Disputed Claims or any other Claims 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' THIRTIETH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Thirtieth Omnibus Objection to Certain Claims (Invalid Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

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 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

[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 otherwise defined herein have the meanings ascribed to them in the Objection.

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 empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified the Disputed Claims which they seek the disallowance of in their entirety.

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

(a) reviewed the Claims Register and the applicable Claim Forms, including any attachments, to determine the asserted amount, classification, and stated basis for each Claim; and

(b) reviewed the information included in or with each Claim Form and determined that each of the Disputed Claims fails to sufficiently specify the legal or factual basis for the asserted liability.

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' THIRTIETH OMNIBUS OBJECTION TO CERTAIN CLAIMS (INVALID CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Disputed Claims set forth on **Schedule 1** hereto 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 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

[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.

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 Disputed Claims listed on **Schedule 1** is disallowed and expunged in its entirety.

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 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.

6. 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).

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

(DISPUTED CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	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
2	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
3	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
4	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
5	FIBER, CHARLES J	ModivCare Inc.	738	9/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - - $ -
6	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
7	HORN, STELLA	ModivCare Inc.	1360	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - - $ -
8	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
9	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
10	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
11	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
12	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
13	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
14	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
15	RICHBURG, BRIANA	ModivCare Inc.	142	9/10/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $500.00 $0.00 $0.00 $500.00
16	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

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit V

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)

NOTICE OF REORGANIZED DEBTORS'
THIRTY-FIRST OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Claim that you filed or that was filed on your behalf has been satisfied in full during the Chapter 11 Cases, such that no further distribution is owing on account of the Claim. The Reorganized Debtors therefore seek to disallow and expunge the Claim.

[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 Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow and expunge your Claim(s) in their entirety on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026, at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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-FIRST OMNIBUS OBJECTION TO CERTAIN CLAIMS (SATISFIED CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO 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 DISALLOWED WITHOUT A HEARING.

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***"), disallowing and expunging each of the claims listed on **Schedule 1** to the Proposed Order (the "***Satisfied Claims***") because each of the Satisfied Claims has been satisfied in full during the course of the Chapter 11 Cases such that no further distribution is owing on account of the Satisfied 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 of the Satisfied Claims that are the subject of this Objection were asserted on proof of claim forms (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 Satisfied Claims (each a "***Claimant***" and collectively the "***Claimants***") have submitted to the Court's jurisdiction over this matter.

[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.

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) and 502 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 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 Thereof; and (C) Granting Related Relief* [Docket No. 66] (the "***Claims Bar Date Order***") setting, *inter alia*, (i) October 1, 2025, as the deadline for non-governmental creditors and interest holders

[3] Docket No. 1055.

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 Claims 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." Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims 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 Claims 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 Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *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]; (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].

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 Satisfied Claims along with this Objection.

13. 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

[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.").

Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.[7]

14. 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, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE SATISFIED CLAIMS

15. The Reorganized Debtors' review of the Claims Register and their books and records allowed them to identify the Satisfied Claims. This Objection seeks to disallow and expunge each of the Satisfied Claims in their entirety because, based on the Reorganized Debtors' books and records, each of the Satisfied Claims has been satisfied in full during the course of the Chapter 11 Cases such that no further distributions are required on account of the Satisfied Claims.

16. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Thirty-First Omnibus Objection to Certain Claims (Satisfied Claims)* attached hereto as **Exhibit A**, based on their review of the Claims Register and their books and records, the Reorganized Debtors and their advisors identified each Satisfied Claim as a Claim that had been satisfied in full during the course of the Chapter 11 Cases.

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

(a) reviewed the Claims Register and the Reorganized Debtors' books and records to identify claims that were satisfied, in whole or in part, after the Petition Date; and

[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.").

(b) determined that each of the Satisfied Claims had been paid in full, or otherwise satisfied, during the course of the Chapter 11 Cases and no further distribution is required on account of any of the Satisfied Claims.

18. Accordingly, the Reorganized Debtors hereby request that the Court enter the Proposed Order disallowing and expunging the Satisfied Claims in their entirety.

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 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." FED. R. BANKR. P. 3007(d). This includes objections on the grounds that claims should be disallowed because they "have been satisfied or released during the case . . . ." FED. R. BANKR. P. 3007(d)(2)(E).

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)).

21. For the reasons set forth below, the Satisfied Claims should be disallowed and expunged in their entirety.

I. The Satisfied Claims Should Be Disallowed Because Such Claims Have Been Satisfied During the Course of the Chapter 11 Cases and No Further Distribution Is Required on Account of Such Claims.

22. The Omnibus Objection Procedures Order specifically authorizes the Reorganized Debtors to file objections to Claims that "have been satisfied by payment in full … on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court." Objection Procedures, ¶ 1(k). Each of the Satisfied Claims has been fully satisfied during the course of the Chapter 11 Cases, and, based on the Reorganized Debtors' books and records, no further distribution is owed on account of such Claims.

23. Accordingly, the Reorganized Debtors respectfully request that the Court enter the Proposed Order disallowing and expunging the Satisfied Claims in their entirety.

RESERVATION OF RIGHTS

24. 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 the single ground of objection set forth herein be dismissed or overruled as to one or more of the Satisfied Claims, the Reorganized Debtors reserve the right to object to each of the Satisfied Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

25. 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

26. 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.

27. 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' THIRTY-FIRST
OMNIBUS OBJECTION TO CERTAIN CLAIMS (SATISFIED CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Thirty-First Omnibus Objection to Certain Claims (Satisfied Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

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 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

[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 otherwise defined herein have the meanings ascribed to them in the Objection.

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 SATISFIED CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Satisfied Claims which they seek to disallow and expunge in their entirety.

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

(a) reviewed the Claims Register and the Reorganized Debtors' books and records to identify claims that were satisfied, in whole or in part, after the Petition Date; and

(b) determined that each of the Satisfied Claims had been paid in full, or otherwise satisfied, during the course of the Chapter 11 Cases and no further distribution is required on account of any of the Satisfied Claims.

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' THIRTY-FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (SATISFIED CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging each of the Satisfied 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 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

[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.

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 Satisfied Claims listed on **Schedule 1** is disallowed and expunged in its entirety.

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 Satisfied Claim and the Reorganized Debtors' objection to each Satisfied Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Satisfied 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; (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).

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

(SATISFIED CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	ADKINS, ALBERT	ModivCare Inc.	951	09/29/2025	General Unsecured Priority Secured Admin Priority Total	$2,000.00 $0.00 $0.00 $0.00 $2,000.00
2	Administrative Services Cooperative, Inc.	ModivCare Inc.	2133	11/17/2025	General Unsecured Priority Secured Admin Priority Total	$142,275.44 $0.00 $0.00 $0.00 $142,275.44
3	Arkansas Department of Finance and Administration	Higi SH LLC	599	09/23/2025	General Unsecured Priority Secured Admin Priority Total	$37.50 $379.42 $0.00 $0.00 $416.92
4	AuditBoard, Inc.	ModivCare Solutions, LLC	531	09/22/2025	General Unsecured Priority Secured Admin Priority Total	$86,122.06 $0.00 $0.00 $0.00 $86,122.06
5	BANKS, DAREN	ModivCare Inc.	1356	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $132.00 $132.00
6	Becklar	Valued Relationships, Inc.	1025	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$866,243.00 $0.00 $0.00 $0.00 $866,243.00
7	Behnken, Jr., John Frederick	ModivCare Solutions, LLC	882	09/23/2025	General Unsecured Priority Secured Admin Priority Total	$435.72 $0.00 $0.00 $0.00 $435.72
8	Behnken, Jr., John Frederick	ModivCare Solutions, LLC	941	09/29/2025	General Unsecured Priority Secured Admin Priority Total	$435.72 $0.00 $0.00 $0.00 $435.72
9	Behnken, Jr., John Frederick	ModivCare Inc.	1111	09/23/2025	General Unsecured Priority Secured Admin Priority Total	$435.72 $0.00 $0.00 $0.00 $435.72
10	BELLEVILLE, NYLE	ModivCare Inc.	980	09/29/2025	General Unsecured Priority Secured Admin Priority Total	$87.10 $0.00 $0.00 $0.00 $87.10
11	Bennett, Arlene	ModivCare Solutions, LLC	384	09/17/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
12	BLAIN, MARSHA	ModivCare Inc.	444	09/18/2025	General Unsecured Priority Secured Admin Priority Total	$29.60 $0.00 $0.00 $0.00 $29.60
13	Butler, Sandra	ModivCare Solutions, LLC	149	09/11/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $47.80 $47.80
14	CAROUSEL FARM EDUCATIONAL CENTER	ModivCare Inc.	65	09/08/2025	General Unsecured Priority Secured Admin Priority Total	$13,036.80 $0.00 $0.00 $0.00 $13,036.80
15	Cheboygan County	ModivCare Solutions, LLC	603	09/23/2025	General Unsecured Priority Secured Admin Priority Total	$492.50 $0.00 $0.00 $0.00 $492.50
16	CLIMAX TECHNOLOGY CO LTD	Valued Relationships, Inc.	1861	10/09/2025	General Unsecured Priority Secured Admin Priority Total	$86,504.00 $0.00 $0.00 $0.00 $86,504.00
17	CNC-ACCESS Inc. a/k/a Community Alternatives Virginia, Inc.	ModivCare Solutions, LLC	1218	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$28,146.00 $0.00 $0.00 $0.00 $28,146.00
18	COX, LEWIS W	ModivCare Solutions, LLC	451	09/18/2025	General Unsecured Priority Secured Admin Priority Total	$1,500.00 $0.00 $0.00 $0.00 $1,500.00
19	CSA Service Solutions, LLC dba EMSAR	ModivCare Inc.	162	09/11/2025	General Unsecured Priority Secured Admin Priority Total	$50,381.55 $0.00 $0.00 $0.00 $50,381.55
20	CT Corporation	Guardian Medical Monitoring, LLC	690	09/24/2025	General Unsecured Priority Secured Admin Priority Total	$527.00 $0.00 $0.00 $0.00 $527.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount Claim Nature	Claim Amount
21	Daniel Lozano	ModivCare Solutions, LLC	526	09/21/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
22	Deborah Gonzales	ModivCare Inc.	888	09/28/2025	General Unsecured Priority Secured Admin Priority Total	$922.35 $0.00 $0.00 $0.00 $922.35
23	Diane Sacks	ModivCare Inc.	13	08/26/2025	General Unsecured Priority Secured Admin Priority Total	$1,512.00 $0.00 $0.00 $0.00 $1,512.00
24	DOOLEY, JUSTIN	ModivCare Solutions, LLC	482	09/19/2025	General Unsecured Priority Secured Admin Priority Total	$268.40 $0.00 $0.00 $0.00 $268.40
25	DOUGLAS, JOSHUA	ModivCare Inc.	741	09/24/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $1,300.00 $0.00 $0.00 $1,300.00
26	DURICARE INC	ModivCare Solutions, LLC	78	09/09/2025	General Unsecured Priority Secured Admin Priority Total	$160,680.00 $0.00 $0.00 $0.00 $160,680.00
27	Exell Water and Coffee, Inc.	ModivCare Inc.	135	09/11/2025	General Unsecured Priority Secured Admin Priority Total	$2,446.75 $0.00 $0.00 $347.86 $2,794.61
28	Exell Water and Coffee, Inc.	ModivCare Inc.	788	09/25/2025	General Unsecured Priority Secured Admin Priority Total	$410.42 $0.00 $0.00 $0.00 $410.42
29	Friendly Medical Transportation	ModivCare Solutions, LLC	1650	10/01/2025	General Unsecured Priority Secured Admin Priority Total	$197,131.07 $0.00 $0.00 $0.00 $197,131.07
30	GAUNA, BARBARA	ModivCare Inc.	607	09/22/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $83.00 $83.00
31	GISER, STANLEY	ModivCare Inc.	720	09/24/2025	General Unsecured Priority Secured Admin Priority Total	$73.00 $0.00 $0.00 $0.00 $73.00
32	Giuliani, Casey	ModivCare Inc.	587	09/22/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $319.34 $0.00 $0.00 $319.34
33	GONZALES, JEANETTE LYNN	ModivCare Solutions, LLC	1347	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
34	Google LLC	Higi SH LLC	1889	10/13/2025	General Unsecured Priority Secured Admin Priority Total	$54,660.00 $0.00 $0.00 $0.00 $54,660.00
35	Google LLC	ModivCare Solutions, LLC	1892	10/13/2025	General Unsecured Priority Secured Admin Priority Total	$16,926.95 $0.00 $0.00 $0.00 $16,926.95
36	GRACE, GWENDOLYN	ModivCare Inc.	427	09/17/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $308.20 $308.20
37	GRAY, CARA H	ModivCare Inc.	2499	02/19/2026	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
38	H J Medical Supplies, Inc	All Metro Home Care Services of New York, Inc.	169	09/11/2025	General Unsecured Priority Secured Admin Priority Total	$20,187.50 $0.00 $0.00 $0.00 $20,187.50
39	Harmony Harriman	ModivCare Inc.	334	09/16/2025	General Unsecured Priority Secured Admin Priority Total	$954.80 $0.00 $0.00 $0.00 $954.80
40	Instant Care, Inc	Valued Relationships, Inc.	200	09/15/2025	General Unsecured Priority Secured Admin Priority Total	$9,637.00 $0.00 $0.00 $4,686.00 $14,323.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount Claim Nature	Claim Amount
41	JL GEISLER SIGN COMPANY	ModivCare Solutions, LLC	170	09/12/2025	General Unsecured Priority Secured Admin Priority Total	$195.00 $0.00 $0.00 $0.00 $195.00
42	JUENEMANN, JENNIFER	ModivCare Inc.	545	09/21/2025	General Unsecured Priority Secured Admin Priority Total	$94.00 $0.00 $0.00 $0.00 $94.00
43	KOEHL, MARIANNE	ModivCare Inc.	924	09/28/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $35.00 $35.00
44	LACOUR, BIANCA	ModivCare Inc.	698	09/24/2025	General Unsecured Priority Secured Admin Priority Total	$105.00 $0.00 $0.00 $0.00 $105.00
45	LAMSON, ARLENE	ModivCare Solutions, LLC	286	09/15/2025	General Unsecured Priority Secured Admin Priority Total	$110.00 $0.00 $0.00 $0.00 $110.00
46	MEDLEY, TERESA	ModivCare Inc.	415	09/17/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $0.00 $0.00
47	MEDREADY, INC.	ModivCare Inc.	171	09/12/2025	General Unsecured Priority Secured Admin Priority Total	$7,031.00 $0.00 $0.00 $35,756.00 $42,787.00
48	Miriam Rosenblum	ModivCare Inc.	1653	10/01/2025	General Unsecured Priority Secured Admin Priority Total	$0.00 $0.00 $0.00 $68.00 $68.00
49	Nixon Peabody LLP	ModivCare Inc.	713	09/24/2025	General Unsecured Priority Secured Admin Priority Total	$146,657.96 $0.00 $0.00 $0.00 $146,657.96
50	Northeast Treatment Centers	ModivCare Solutions, LLC	2050	11/05/2025	General Unsecured Priority Secured Admin Priority Total	$113,627.00 $0.00 $0.00 $0.00 $113,627.00
51	Ohio Department of Taxation	Guardian Medical Monitoring, LLC	765	09/25/2025	General Unsecured Priority Secured Admin Priority Total	$5,120.99 $18,209.86 $0.00 $0.00 $23,330.85
52	Polsinelli PC	ModivCare Inc.	1155	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$7,668.00 $0.00 $0.00 $0.00 $7,668.00
53	RONALD MCDONALD, RMHCENC	ModivCare Inc.	1023	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$178,670.00 $0.00 $0.00 $28,480.00 $207,150.00
54	ROY L STREET/CAPITOL CAB CO	ModivCare Solutions, LLC	1049	09/29/2025	General Unsecured Priority Secured Admin Priority Total	$9,066.22 $0.00 $0.00 $0.00 $9,066.22
55	SANCHEZ, GLORIA	ModivCare Inc.	911	09/29/2025	General Unsecured Priority Secured Admin Priority Total	$128.70 $0.00 $0.00 $0.00 $128.70
56	Schrankel, Steven	ModivCare Inc.	744	9/24/2025	General Unsecured Priority Secured Admin Priority Total	$708.50 $0.00 $0.00 $0.00 $708.50
57	Scotia Livery Inc	All Metro Home Care Services of New York, Inc.	66	09/08/2025	General Unsecured Priority Secured Admin Priority Total	$137,411.10 $0.00 $0.00 $0.00 $137,411.10
58	SIGNATURE STAFF RESOURCES LLC	ModivCare Solutions, LLC	100	09/09/2025	General Unsecured Priority Secured Admin Priority Total	$16,903.85 $0.00 $0.00 $0.00 $16,903.85
59	SKYLINE CLEANING LLC	ModivCare Solutions, LLC	1015	09/30/2025	General Unsecured Priority Secured Admin Priority Total	$11,903.23 $0.00 $0.00 $0.00 $11,903.23
60	Tech Mahindra Americas Inc	ModivCare Inc.	1877	10/10/2025	General Unsecured Priority Secured Admin Priority Total	$185,053.00 $0.00 $0.00 $0.00 $185,053.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount Claim Nature	 Claim Amount
61	Tennessee Department of Revenue	National MedTrans, LLC	197	09/15/2025	General Unsecured Priority Secured Admin Priority Total	$744.75 $3,415.11 $0.00 $0.00 $4,159.86
62	US COFFEE	All Metro Home Care Services of New York, Inc.	75	09/09/2025	General Unsecured Priority Secured Admin Priority Total	$994.99 $0.00 $0.00 $0.00 $994.99
63	WILLOWOOD PARK LLC	ModivCare Inc.	351	09/17/2025	General Unsecured Priority Secured Admin Priority Total	$60,784.24 $0.00 $0.00 $0.00 $60,784.24
64	WRIKE, INC	ModivCare Inc.	359	09/16/2025	General Unsecured Priority Secured Admin Priority Total	$28,800.00 $1,483.20 $0.00 $0.00 $30,283.20

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit W

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)

NOTICE OF REORGANIZED DEBTORS'
THIRTY-SECOND OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this "*Notice*") should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by November 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the "***Reorganized Debtors***") have filed the Objection attached hereto as Appendix 1 (the "***Omnibus Objection***") to your claim(s).[2]

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because it fails to include documentation sufficient to substantiate the asserted liability or amount and, based on their books and records, the Reorganized Debtors are not aware of any liability on account of the Claim.

[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 Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "***Response***") with the United States Bankruptcy Court for the Southern District of Texas (the "***Court***") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time).**

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at https://www.txs.uscourts.gov or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **November 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to disallow and expunge your Claim(s) in their entirety on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "***Objection Procedures***").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures require that each Response must contain the following information (at a minimum):

a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

c) the following contact information for the responding party:

i. the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

ii. the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **November 30, 2026**, **at 4:00 p.m. (prevailing Central Time)** unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

COUNSEL FOR THE REORGANIZED DEBTORS

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II, Jason W. Harbour, and Brandon Bell
600 Travis Street, Suite 4200, Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com; jharbour@hunton.com; bbell@hunton.com

LATHAM & WATKINS LLP
Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan J. Weichselbaum
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

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO 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 DISALLOWED WITHOUT A HEARING.

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***"), disallowing and expunging the claims listed on **Schedule 1** to the Proposed Order (the "***Insufficient Documentation Claims***") in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any amount owed on account of each such Insufficient Documentation Claim.

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 Insufficient Documentation 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 Insufficient

[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.

Documentation Claims (each 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) and 502 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 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, 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]; (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*

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 Insufficient Documentation Claims along with this Objection.

[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. 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]

14. 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, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE INSUFFICIENT DOCUMENTATION CLAIMS

15. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms allowed them to identify the Insufficient Documentation Claims. This Objection seeks to disallow and expunge the Insufficient Documentation Claims in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of each such Insufficient Documentation Claim.

16. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Thirty-Second Omnibus Objection to Certain Claims (Insufficient Documentation Claims)*, attached hereto as **Exhibit A**, based on their review of the Claims Register and applicable Claim Forms, the Reorganized Debtors and their advisors identified each Insufficient

[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.").

Documentation Claim listed on **Schedule 1** to the Proposed Order as failing to provide documentation sufficient to substantiate the asserted liability or amount. To identify the Insufficient Documentation Claims, the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any amount owed on account of each Insufficient Documentation Claim.

17. The Reorganized Debtors hereby request that the Insufficient Documentation Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

18. 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 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." FED. R. BANKR. P. 3007(d). This includes objections on the grounds that claims should be disallowed because they "were presented in a form that does not comply with applicable rules and the objection states that

the objector is therefore unable to determine a claim's validity . . . ." FED. R. BANKR. P. 3007(d)(2)(F).

19. 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)).

20. Here, the Bar Date Order expressly provides that 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; *see also* Objection Procedures, ¶ 1(h) (authorizing the Reorganized Debtors to file omnibus objections to Claims that "fail … to provide sufficient supporting documentation therefor."). As set forth above, each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount. Moreover, based on the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of the Insufficient Documentation Claims. Thus, the Insufficient Documentation Claims are subject to disallowance.

21. Accordingly, the Reorganized Debtors respectfully request that the Court enter the Proposed Order disallowing and expunging the Insufficient Documentation Claims in their entirety.

RESERVATION OF RIGHTS

22. 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 of the Insufficient Documentation Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

23. 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

24. 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.

25. 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'
THIRTY-SECOND OMNIBUS OBJECTION TO
CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Thirty-Second Omnibus Objection to Certain Claims (Insufficient Documentation Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

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 commencement of the Chapter 11 Cases. The facts set forth in this Affidavit are based upon my

[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 otherwise defined herein have the meanings ascribed to them in the Objection.

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 INSUFFICIENT DOCUMENTATION CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Insufficient Documentation Claims which they seek to disallow and expunge in their entirety.

5. The Insufficient Documentation Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any amount owed on account of each Insufficient Documentation Claim.

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.

[*Remainder of page intentionally left blank.*]

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' THIRTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Insufficient Documentation Claims in their entirety as 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

[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.

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 Insufficient Documentation Claim listed on **Schedule 1** is disallowed and expunged in its entirety.

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

6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Insufficient Documentation 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).

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

(INSUFFICIENT DOCUMENTATION CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	ANSPACH, CHRISTOPHER	ModivCare Inc.	563	09/22/2025	General Unsecured	$150.80
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$150.80
2	Armstrong, Alysshia M	ModivCare Inc.	103	09/09/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
3	BACA, ELIZABETH	ModivCare Solutions, LLC	1618	10/01/2025	General Unsecured	$1,373.40
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,373.40
4	BD Health Services	ModivCare Inc.	928	09/29/2025	General Unsecured	$489.53
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$489.53
5	BONG, KENNETH	ModivCare Inc.	1357	09/30/2025	General Unsecured	$0.00
					Priority	$3,634.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$3,634.00
6	Bowling, Kathy Sue	ModivCare Inc.	366	09/16/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
7	Bragg, Joan	ModivCare Inc.	1660	10/01/2025	General Unsecured	$150.50
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$150.50
8	BROCK, BRITTNEY L.	ModivCare Inc.	1691	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$5,000.00
					Admin Priority	$0.00
					Total	$5,000.00
9	BROWN, ANNIE L	ModivCare Inc.	423	09/17/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$26,000.00
					Total	$26,000.00
10	Calbert, Victor	ModivCare Inc.	1688	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$4,800.00
					Total	$4,800.00
11	Cormier, Pamela	ModivCare Inc.	639	09/23/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
12	CROUSE, MATTHEW	TriMed, LLC	185	09/11/2025	General Unsecured	$0.00
					Priority	$20,950.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,950.00
13	CRUZ, JULIA V	All Metro Aids Inc.	795	09/26/2025	General Unsecured	$3,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$3,000.00
14	Denney, Ryan P	ModivCare Inc.	1458	10/01/2025	General Unsecured	$8,090.00
					Priority	$0.00
					Secured	$27,010.00
					Admin Priority	$0.00
					Total	$35,100.00
15	Donaldson, Mark P	ModivCare Inc.	2246	01/12/2026	General Unsecured	$100.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$100.00
16	DONKOR, PATRICIA	All Metro Home Care Services of New York, Inc.	561	09/22/2025	General Unsecured	$908.31
					Priority	$0.00
					Secured	$908.31
					Admin Priority	$0.00
					Total	$1,816.62
17	Dove, Tanya	ModivCare Inc.	1686	10/01/2025	General Unsecured	$1,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,000.00
18	Drumgold, Naomi	Caregivers America, LLC.	1630	10/01/2025	General Unsecured	$0.00
					Priority	$300.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$300.00
19	ELLIS, JENINE	ModivCare Inc.	471	9/19/2025	General Unsecured	$0.00
					Priority	$5,000.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$5,000.00
20	EPISKOPOSYAN, VARDAN	ModivCare Inc.	478	09/18/2025	General Unsecured	$0.00
					Priority	$700.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$700.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
21	FERKO, LORETTA	All Metro Field Service Workers Payroll Services Corporation	1342	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$2,625.00
					Total	$2,625.00
22	Finkelstein, Raphael P	ModivCare Inc.	1075	09/30/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
23	Fossett, Betty	ModivCare Inc.	946	09/29/2025	General Unsecured	$5,450.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$5,450.00
24	FREEMAN, MELECIA	ModivCare Solutions, LLC	937	09/29/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$4,500.00
					Total	$4,500.00
25	Gooden, Latasha	ModivCare Solutions, LLC	176	09/11/2025	General Unsecured	$1,700.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,700.00
26	GRAY, CARA H	ModivCare Inc.	1421	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
27	Green, Sharonda	Provado Technologies, LLC	1683	10/01/2025	General Unsecured	$1,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,000.00
28	HALPERN, BRUCE	ModivCare Solutions, LLC	776	09/25/2025	General Unsecured	$64.32
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$64.32
29	Harper, Shelah	CareGivers America Home Health Services, LLC	1033	09/30/2025	General Unsecured	$0.00
					Priority	$6,400.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$6,400.00
30	HAYNES, THOMAS	ModivCare Inc.	891	09-28-26	General Unsecured	$5,500.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$5,500.00
31	Hicks, Tayla	ModivCare Solutions, LLC	173	09/12/2025	General Unsecured	$250.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$250.00
32	Hill, John	ModivCare Inc.	636	09/23/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
33	HOWER, SHAWNA	ModivCare Inc.	283	09/16/2025	General Unsecured	$1,193.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,193.00
34	JACKSON, ALEXIS	ModivCare Inc.	510	09/22/2025	General Unsecured	$15,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$15,000.00
35	Lacroix, Sara Georgine	ModivCare Inc.	1603	10/01/2025	General Unsecured	$0.00
					Priority	$20,979.33
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,979.33
36	Layport, Aimee	ModivCare Inc.	1081	09/30/2025	General Unsecured	$2,206.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$2,206.00
37	Lewis, Dwayne	ModivCare Inc.	919	09/29/2025	General Unsecured	$385.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$385.00
38	Malone, Tambra	ModivCare Inc.	1659	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$400.00
					Admin Priority	$0.00
					Total	$400.00
39	Matamoros, Shirley	All Metro Home Care Services of New York, Inc.	1346	10/01/2025	General Unsecured	$0.00
					Priority	$1,069.60
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,069.60
40	MCCLELLAN, KAYLA	ModivCare Solutions, LLC	1101	09/30/2025	General Unsecured	$0.00
					Priority	$100.00
					Secured	$0.00
					Admin Priority	$367.00
					Total	$467.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
41	Newsom, Kiamesha	ModivCare Inc.	496	09/19/2025	General Unsecured	$0.00
					Priority	$8,000.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$8,000.00
42	NEWTON, MICHAELA	ModivCare Solutions, LLC	1104	09/30/2025	General Unsecured	$686.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$686.00
43	OTOOLE, BRIAN	Metropolitan Medical Transportation IPA, LLC	571	09/22/2025	General Unsecured	$138.60
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$138.60
44	Quaglio, Jennifer	ModivCare Inc.	1282	09/30/2025	General Unsecured	$0.00
					Priority	$20,000.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,000.00
45	Raza, Shereen	ModivCare Inc.	909	09/29/2025	General Unsecured	$1,454.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,454.00
46	Rodriguez Camacho, Samely	A & B Homecare Solutions, L.L.C.	505	09/19/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$5,000.00
					Total	$5,000.00
47	RODRIGUEZ, JAZMIN A	ModivCare Inc.	916	9/27/2025	General Unsecured	$0.00
					Priority	$17,150.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$17,150.00
48	RONALD MCDONALD HOUSE CHARITIES OF COLUMBIA	ModivCare Solutions, LLC	1468	09/30/2025	General Unsecured	$48,645.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$14,595.00
					Total	$63,240.00
49	Rutan, Robin	ModivCare Inc.	1464	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
50	SADLO, VIVIEN	ModivCare Solutions, LLC	1609	10/01/2025	General Unsecured	$20,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,000.00
51	SCHETROMPF, KEVIN	ModivCare Inc.	622	09/21/2025	General Unsecured	$0.00
					Priority	$2,378.48
					Secured	$0.00
					Admin Priority	$3,547.86
					Total	$5,926.34
52	Schrankel, Steven	ModivCare Solutions, LLC	593	09/22/2025	General Unsecured	$708.50
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$708.50
53	SHERLOCK, DIANE	ModivCare Inc.	305	09/16/2025	General Unsecured	$253.95
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$253.95
54	STEVENS, SHERLENE	ModivCare Inc.	757	9/24/2025	General Unsecured	$1,996,200.00
					Priority	$3,800.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$2,000,000.00
55	Timarky, Enileska	ModivCare Inc.	419	09/17/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$260.00
					Total	$260.00
56	TOMBERLIN, TRACY	ModivCare Inc.	887	09/28/2025	General Unsecured	$1,443.72
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,443.72
57	Tyree, Candice	ModivCare Inc.	1118	09/30/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
58	White, Danielle	ModivCare Solutions, LLC	612	09/20/2025	General Unsecured	$600.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$600.00
59	Wilson, Ivory	ModivCare Inc.	915	09/26/2025	General Unsecured	$713.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$713.00
60	YOUNG, ARETTA	ModivCare Inc.	1622	10/01/2025	General Unsecured	$6,210.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$6,210.00

Appendix 2

Objection Procedures

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)

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors[2] may file omnibus objections (each, an "***Omnibus Objection***") to Claims on the grounds that such Claims, in part or in whole:

(a) are inconsistent with the Reorganized Debtors' books and records;

(b) fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");

(c) seek recovery of amounts for which the Reorganized Debtors are not liable;

(d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors' Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;

(e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;

(f) fail to specify a Reorganized Debtor against which the Claim is asserted;

---

[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 *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the "***Motion***").

(g) are disallowed pursuant to section 502 of the Bankruptcy Code;

(h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;

(i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;

(j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the "***Withdrawal Form***") available on the Claims and Noticing Agent's website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);

(k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

(l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or

(m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the recission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors' objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

(a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;

(b) the asserted amount of the Claim;

(c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;

(d) a summary of the grounds for the objection;

(e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and

(f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "***Order***") as **Exhibit 2** (the "***Objection Notice***"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

(a) adequately describe the nature of the objection;

(b) inform Holders that their rights may be affected by the objection;

(c) describe the procedures for filing a written response (each, a "***Response***") to the objection, including all relevant dates and deadlines related thereto;

(d) identify the hearing date, if applicable, and related information; and

(e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "***Response Procedures***") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

(a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;

(b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and

(c) the following contact information for the responding party:

(i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or

(ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: https://ecf.txsb.uscourts.gov/.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.