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 28, 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**:

- **Order Granting Reorganized Debtors' Eighteenth Omnibus Objection to Certain Proofs of Claim** [Docket No. 1824]
- **Order Granting Reorganized Debtors' Objection to Proof of Claim Number 1592** [Docket No. 1825]
- **Order Granting Reorganized Debtors' Objection to Proof of Claim Number 1570** [Docket No. 1826]
- **Order Granting Reorganized Debtors' Twenty-Second Omnibus Objection to Certain Claims** [Docket No. 1827]
- **Order Granting Reorganized Debtors' Twenty-Fourth Omnibus Objection to Certain Claims** [Docket No. 1828]

[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.

2590309261104000000000003

- **Order Granting Reorganized Debtors' Twenty-Fifth Omnibus Objection to Certain Claims (Invalid Claims)** [Docket No. 1829]

- **Notice and Reorganized Debtors' Thirty-Third Omnibus Objection to Certain Claims (Reduce and Reclassify Claims)** [attached hereto as **Exhibit N**; substantially in the form of Docket No. 1830]

Furthermore, on October 28, 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**:

- **Order Granting Reorganized Debtors' Eighteenth Omnibus Objection to Certain Proofs of Claim** [Docket No. 1824]

Furthermore, on October 28, 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**:

- **Order Granting Reorganized Debtors' Objection to Proof of Claim Number 1592** [Docket No. 1825]

Furthermore, on October 28, 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 F**:

- **Order Granting Reorganized Debtors' Objection to Proof of Claim Number 1570** [Docket No. 1826]

Furthermore, on October 28, 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**:

- **Order Granting Reorganized Debtors' Twenty-Second Omnibus Objection to Certain Claims** [Docket No. 1827]

Furthermore, on October 28, 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**:

- **Order Granting Reorganized Debtors' Twenty-Fourth Omnibus Objection to Certain Claims** [Docket No. 1828]

Furthermore, on October 28, 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**:

- **Order Granting Reorganized Debtors' Twenty-Fifth Omnibus Objection to Certain Claims (Invalid Claims)** [Docket No. 1829]

Furthermore, on October 28, 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**:

- **Notice and Reorganized Debtors' Thirty-Third Omnibus Objection to Certain Claims (Reduce and Reclassify Claims)** [attached hereto as **Exhibit N**; substantially in the form of Docket No. 1830]

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

Eighteenth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Andrew Richard Winner		Email on File
April Rumill		Email on File
BRAR, JASPREET		Email on File
Brownsville Independent School District	Hiram A. Gutierrez	edinburgbankruptcy@pbfcm.com
Brownsville Independent School District	Perdue, Brandon, Fielder, Collins and Mott, LLP	edinburgbankruptcy@pbfcm.com
Cameron County	c/o Diane W. Sanders	austin.bankruptcy@lgbs.com
City of Houston	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
City of Houston	Melissa E. Valdez	mvaldez@pbfcm.com
City of Houston		mvaldez@pbfcm.com
City of McAllen	c/o Diane W. Sanders	austin.bankruptcy@lgbs.com
Commonwealth of Virginia Department of Taxation	Department of Taxation	va_tax_bk@harriscollect.com
Commonwealth of Virginia Department of Taxation		va_tax_bk@harriscollect.com
Cypress-Fairbanks ISD	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
Department of Treasury - Internal Revenue Service	Internal Revenue Service	casandra.j.watson@irs.gov
Department of Treasury - Internal Revenue Service	United States Attorneys Office	USATXS.CivilNotice@usdoj.gov
Ellis County	c/o John Kendrick Turner	John.Turner@lgbs.com; dallas.bankruptcy@lgbs.com
Franchise Tax Board	Bankruptcy Section MS A340	cathy.saechao@ftb.ca.gov
Harris Co ESD # 07	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
Harris Co ESD # 09	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
Harris Co ESD # 11	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
HARRIS CO ESD # 16	LINEBARGER GOGGAN BLAIR & SAMPSON, LLP	houston_bankruptcy@lgbs.com
Harris County ESD #16	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
HOUSTON CITY COLLEGE	LINEBARGER GOGGAN BLAIR & SAMPSON, LLP	houston_bankruptcy@lgbs.com
Houston Comm Coll System	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
Houston ISD	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
Joachim-Plattin Ambulance District	Jeffrey Roorda	jroorda@proclaimsbilling.com
Jonathan Linder		Email on File
Jonathan Ray Linder		Email on File
KATY ISD	LINEBARGER GOGGAN BLAIR & SAMPSON, LLP	houston_bankruptcy@lgbs.com
Lalla Nabila Azallali El Idrissi		Email on File
LONE STAR COLLEGE SYSTEM	LINEBARGER GOGGAN BLAIR & SAMPSON, LLP	houston_bankruptcy@lgbs.com
Montgomery County	Linebarger Goggan Blair & Sampson, LLP	houston_bankruptcy@lgbs.com
Northeast Treatment Centers	Tara Young	tara.young@net-centers.org
Nueces County	c/o Diane W. Sanders	austin.bankruptcy@lgbs.com
Onepak Inc		controller@onepak.com
Pacific East Research Inc	Scott Rice	crobinson@pacificeast.com
PACIFIC EAST RESEARCH INC		accounting@pacificeast.com
PHI Air Medical		myphiadvocate@phiairmedical.com
PHI Health LLC Dba PHI Air Medical	PHI Air Medical	myphiadvocate@phiairmedical.com
REGER RIZZO & DARNALL, LLP	LOUIS J RIZZO, ESQ	lrizzo@regerlaw.com
REGER RIZZO AND DARNALL, LLP	LOUIS J. RIZZO, ESQUIRE	lrizzo@regerlaw.com
REGER RIZZO AND DARNALL, LLP		lrizzo@regerlaw.com
Rumill, April		Email on File
SKYLINE CLEANING LLC		SKYLINECLEANINGLLC@YAHOO.COM; ajscommercialcleaning@outlook.com
Texas Comptroller of Public Accounts	Attn Revenue Accounting Div.	bankruptcysection@cpa.texas.gov
Texas Comptroller of Public Accounts	Office of the Attorney General	bankruptcytax@oag.texas.gov
Texas Comptroller of Public Accounts	Revenue Accounting Division	bankruptcysection@cpa.texas.gov

Exhibit D

Exhibit D

Eighteenth Omnibus Objection Claimants Service List
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
City of Houston	HARRIS COUNTY TAX OFFICE / LGBS	HOUSTON ISD	PO BOX 4576	HOUSTON	TX	77210-4576
Cypress-Fairbanks ISD		PO Box 4576		Houston	TX	77210-4576
CYPRESS-FAIRBANKS ISD		10494 JONES RD RM 106		HOUSTON	TX	77065-4210
Department of Treasury - Internal Revenue Service	Internal Revenue Service	P.O. Box 7346		Philadelphia	PA	19101-7346
Department of Treasury - Internal Revenue Service	United States Department of Justice	Office of the Attorney General	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Harris Co ESD # 07	HARRIS COUNTY TAX OFFICE / LGBS	HARRIS CO ESD # 07	PO BOX 4576	HOUSTON	TX	77210-4576
Harris Co ESD # 09	HARRIS COUNTY TAX OFFICE / LGBS	HARRIS CO ESD # 09	PO BOX 4576	HOUSTON	TX	77210-4576
Harris Co ESD # 11	HARRIS COUNTY TAX OFFICE / LGBS	HARRIS CO ESD # 11	PO BOX 4576	HOUSTON	TX	77210-4576
HARRIS CO ESD # 16	HARRIS COUNTY TAX OFFICE / LGBS	HARRIS CO ESD # 16	PO BOX 4576	HOUSTON	TX	77210-4576
HOUSTON CITY COLLEGE	HARRIS COUNTY TAX OFFICE / LGBS	HOUSTON CITY COLLEGE	PO BOX 4576	HOUSTON	TX	77210-4576
HOUSTON COMM COLL SYSTEM		PO BOX 4576		HOUSTON	TX	77210-4576
Houston ISD	HARRIS COUNTY TAX OFFICE / LGBS	HOUSTON ISD	PO BOX 4576	HOUSTON	TX	77210-4576
KATY ISD	HARRIS COUNTY TAX OFFICE / LGBS	KATY ISD	PO BOX 4576	HOUSTON	TX	77210-4576
LONE STAR COLLEGE SYSTEM	HARRIS COUNTY TAX OFFICE / LGBS	LONE STAR COLLEGE SYSTEM	PO BOX 4576	HOUSTON	TX	77210-4576
MONTGOMERY COUNTY		400 N SAN JACINTO ST		CONROE	TX	77301

Exhibit E

Exhibit E

Affected Claimant Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Dianna Guinyard as Class Representative	Kevin Stoops	kstoops@sommerspc.com; md@dundon.com

Exhibit F

Exhibit F

Affected Claimant Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Sommers Schwartz, P.C.	Kevin Stoops	kstoops@sommerspc.com; md@dundon.com

Exhibit G

Exhibit G

Twenty-Second Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Batista de Minaya, Sotera		Email on File
BENJAMIN BRYAN DIPON		Email on File
BENSON, QUEEN		Email on File
Bewley, Linda		Email on File
BLAKELY, JERMAINE		Email on File
Bonamou, Angeline		Email on File
Campos, Joeleen		Email on File
CAPERS, HERMAN		Email on File
CASTLE, RIAN N		Email on File
Chloe, Jason		Email on File
CLINTON BRADLEY		Email on File
COLLINS, PATRICK		Email on File
Daniels, Racheal		Email on File
DAVIS, AUDRI	AUDRIANNA DAVIS	Email on File
DENDY, STEVEN JR.		Email on File
DOBBINS, WILLIAM		Email on File
Donald, Brenda		Email on File
EARL CAGE	EARL	Email on File
Elgia Mae Curtis	Eric Curtis	Email on File
ESTELITA DIPON		Email on File
ETCITTY, SUZANNA A		Email on File
FOSTER, CHRIS		Email on File
Freddy Anthony Maestas		Email on File
Futurinvest Gestion SL		administracion@grupofuturinvest.com
GINAUD, JEAN L		Email on File
Grimmett, Michael		Email on File
Harmon, Marina D		Email on File
Harris, Anthony		Email on File
HATFIELD, SAMANTHA		Email on File
HEDDEN, TAMI		Email on File
HILL, JESSICA		Email on File
HINES, CHERYL		Email on File
Hinton, Jamila		Email on File
HOWER, WILLIAM ELLIS		Email on File
Hutchinson, Matthew W		Email on File
Jack, Dawn		Email on File
JACKSON, CARRIE		Email on File
JAMES, MARISSA		Email on File
Jane Henry		Email on File
Jarvis, Selena		Email on File
Joe Garcia		Email on File
JOHN LACY	Z64697	Email on File
JOHNSON, BRITTANY		Email on File
Jones, Darryl Glenn		Email on File
Joseph, Behalmay		Email on File
Joshua Glasure		Email on File
Jow, Alice	Lily Kwok	Email on File
Katherine Kellihan		Email on File
KEENER, ANASTASIA		Email on File
King, Donald	Sonja Denise King	Email on File
KINNISON, KIM	Michelle Cox	Email on File

Exhibit G

Twenty-Second Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
KINNISON, KIM		Email on File
LAFKO, HANNA E		Email on File
Latia Horton		Email on File
Latron Robinson		Email on File
LAURINCE, JUBENS	JAMES G. DEBROSSE, ESQ. P.C.	Email on File
LAURINCE, JUBENS	JAMES GERARD G DEBROSSE	Email on File
Lewis, Travis		Email on File
LINDA POSTELL LEMON		Email on File
LORI EVADNEY JONES	LORI JONES	Email on File
Louise Clark		Email on File
LUVENE, JAVON		Email on File
LYNCH, MARCIA		Email on File
MACIE, STEVEN		Email on File
Maestas, Freddy Anthony	Freddy A Maestas	Email on File
Maki, Amber Lynn		Email on File
Malone, Taniesha		Email on File
Manzo, Luis		Email on File
MARIETTE CHEREMOND		Email on File
MARTIN, CYNTHIA		Email on File
MARY AUSTIN	MARY A AUSTIN	Email on File
Matariyeh, Reema		Email on File
Maya Clanton		Email on File
MCCOY, JOSEPH		Email on File
McCray, Tonya		Email on File
McDaniels Camp, Helen		Email on File
MCKENZIE, CECIL D		Email on File
MESSER, NASHELL		Email on File
Michael Asbury		Email on File
Michelle Moleres		Email on File
Omotade, Munirah		Email on File
Ouellette, Jerry		Email on File
PELSINSKI, MEGAN		Email on File
PFEFFER, RACHEL MARIE	RACHEL TAYLOR	Email on File
Pryor, David M		Email on File
Pyle, Martha		Email on File
RAMIREZ, ROGELIO		Email on File
Ramm, Melissa		Email on File
Rebekah Moore		Email on File
REICHBACH, JERRY		Email on File
RELPH, CHERIE		Email on File
Ricoh-USA, Inc.		oraclebankruptcyteam@ricoh-usa.com
ROBERSON, TURNELL R	TURNELL RASHAD ROBERSON	Email on File
ROSAS, SANDRA		Email on File
SALTER, NIKINA		Email on File
Shanequa Grant		Email on File
Shanyecia Johnson		Email on File
THOMAS I HARRIS	THOMAS IRVIN HARRIS	Email on File
Verita Jenkins		Email on File

Exhibit H

Exhibit H

Twenty-Second Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	Address1	City	State	Zip
ASBURY, MICHAEL	Address on File			
Bewley, Linda	Address on File			
Burgess, Edward	Address on File			
Campos, Joeleen	Address on File			
FINCHAM, WAYNE	Address on File			
GREEN, TAMMY	Address on File			
LONG, JUDD	Address on File			
MARTIN, CYNTHIA	Address on File			

Exhibit I

Exhibit I

Twenty-Fourth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
ANDERSON, LORI		Email on File
BASS, CATHERINE A		Email on File
BERVIN ANTHONY JACKSON		Email on File
Brooks, Susan		Email on File
COSOM, QUEEN		Email on File
Covian, Elizabeth		Email on File
Epperhart, Katelynn	Katelynn Nicole Epperhart	Email on File
Epperhart, Katelynn		Email on File
FOSTER, DAISY		Email on File
Gauldin, Synthia		Email on File
GOFF, IMELDA		Email on File
GOTSHAW, CARMELLIA	CARMELLIA D GOTSHAW	Email on File
GUZMAN, DULCE		Email on File
HILL, MARY		Email on File
HILL, REBEKAH J		Email on File
Hitchcock, Donna		Email on File
Holland, Catherine		Email on File
Holley, Kelly S		Email on File
HOLLIDAY, SHARESS S		Email on File
HORN, ANGELA		Email on File
Jefferson, Gwendolyn		Email on File
JEFFREY, LATASHA		Email on File
Johnson, Tammy L		Email on File
Lancia, Helen		Email on File
Lane, Alexsandria		Email on File
LANE, JASON		Email on File
Lowery, Carmon		Email on File
MAILO, TRACY		Email on File
Marianne Gilkey		Email on File
MARTIN, STEPHAINE		Email on File
MCKNIGHT, KANARICA		Email on File
Moon, Jasmine		Email on File
MORALES, LYDIA		Email on File
OBRIEN, CHRISTINE	CHRISTINE CORRIGAN	Email on File
Primo, Janice		Email on File
Rachel Long, Passed Away June 9th Her Husband Toney Long	Toney Long	Email on File
Rachel Long, Passed Away June 9th Her Husband Toney Long		Email on File
ROBERT GRIMES		Email on File
RODRIGUEZ, JAZMIN A		Email on File
SAMPSON, MONIKA SHANTA		Email on File
SHAMAN, TONY		Email on File
SIMS, ROSHAUNDA		Email on File
SKURKA, PHILLIP		Email on File
Stephen Harris		Email on File
Thomas, Latoya		Email on File
Thornton, Patricia G		Email on File
Yusef Wade		Email on File

Exhibit J

Exhibit J

Twenty-Fourth Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
ADKINS, MELISSA		Address on File				
Allen, Mary	Mary E Allen	Address on File				
Allen, Mary		Address on File				
Ardella M. Evans	Evans, Ardella	Address on File				
Azurdia, Georgina		Address on File				
Behrends, Virginia		Address on File				
CADWELL, MARIE		Address on File				
DEEL, TRAVIS	TRAVIS LEE DEEL	Address on File				
HEITNANN, BRIAN		Address on File				
HOOKER, HERBERT		Address on File				
Johnson, Tammy L		Address on File				
Long, Catherine		Address on File				
Lyons, Mary		Address on File				
Mccann, Destiny		Address on File				
MORALES, LYDIA		Address on File				
MUNSEY, KIMBERLY R		Address on File				
Perez, Andres		Address on File				
Phillips, Phyllis		Address on File				
Tabon, Shelia		Address on File				
Thomas, Latoya		Address on File				
WILLIS, CINDY		Address on File				
WORLEY, MARK		Address on File				

Exhibit K

Exhibit K

Twenty-Fifth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Alachua County Fire/Rescue	Kathy Niederloh	kfniederloh@alachuacounty.us
B and S Properties	Brett Whiteside	infoarbor1@gmail.com
Bahr, Alison M		Email on File
BRAR, JASPREET		Email on File
BRIAN JAMAR GREEN	BRIAN GREEN	Email on File
Busby, LaTonya		Email on File
Carman Tyson		Email on File
Chavez, Antonio	Trini Trevino	Email on File
Chavez, Antonio		Email on File
Collins, Shelia Renee	Shelia R. Collins	Email on File
COLYER, JOYCE		Email on File
Crowell, Dylan		Email on File
DO, DONALD THANH		Email on File
Ellis, Jenine		Email on File
Emanuel Carton		Email on File
Faizah-Begum Miah		Email on File
Falck Mobile Health Corp		nicollette.loo@falck.com
Ferro, Victoria	Victoria Holt	Email on File
Fiber, Charles J		Email on File
HAMMOND, SHERRIE S		Email on File
HORN, STELLA	Sandra E. Davis	Email on File
HORN, STELLA		Email on File
Inter City Fire Protection District		emerry@dmbsinc.org
Jason Jon douglas St Amand		Email on File
Jenine Ellis		Email on File
Jennifer L Morton		Email on File
JOACHIM-PLATTIN AMBULANCE DISTRICT	JEFFREY ROORDA	jroorda@proclaimsbilling.com
Johnson, Cinda		Email on File
KIN LEE		Email on File
LIEBHAUSER, JOHN		Email on File
Mark R Warren		Email on File
Mi Yang		Email on File
Michael Bauer		Email on File
Michael J. Rumage	Michael Rumage	Email on File
Michael J. Rumage		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
RODRIGUEZ, JAZMIN A		Email on File
Ryan Lipinski		Email on File
Sergio Lizasoain Moya		Email on File
SHERLENE STEVENS	C/O THE SHERLENE BRAND	Email on File
Skelly, Cheryl		Email on File
St Amand, Jayson	Jason Jon Douglas St Amand	Email on File
Steven M. Balian		Email on File

Exhibit L

Exhibit L

Twenty-Fifth Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Avelli, Steven		Address on File				
Bahr, Alison M		Address on File				
Chavez, Antonio	Trini Trevino	Address on File				
Chavez, Antonio		Address on File				
Collins, Shelia Renee		Address on File				
Jones, Eva		Address on File				
Morris, Bonita		Address on File				

Exhibit M

Exhibit M

Thirty-Third Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
City of Sullivan	Carrie Creek	carriec@sullivanil.us
DRIVEBOSS LLC		dima@drivebossllc.com
Onepak Inc		controller@onepak.com
Susan Tonkin		Email on File

Exhibit N

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-THIRD OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to reduce, reclassify, and allow 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, reclassified, and allowed 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, reclassified, and allowed 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 **Schedule 1** to the proposed order attached to the Omnibus Objection, the Reorganized Debtors believe that your Claim asserts an amount exceeding what they owe and asserts administrative or priority treatment, in whole or in part, to which you are not entitled. The Reorganized Debtors seek to reduce, reclassify, and allow your Claim in the amount and classification shown on Schedule 1 and to disallow and expunge any amount exceeding the proposed allowed amount.

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[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 reduced, reclassified, and allowed in the amount and classification shown on **Schedule 1**, with any excess amount 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 seek to reduce, reclassify, and allow the Claims listed on Schedule 1 to the proposed order in the amounts and classifications shown on that schedule, and to disallow and expunge any asserted amounts exceeding the proposed allowed amounts.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which is 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.**

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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-THIRD OMNIBUS OBJECTION TO CERTAIN CLAIMS (REDUCE AND RECLASSIFY CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO REDUCE, RECLASSIFY, AND ALLOW 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, RECLASSIFIED, AND ALLOWED WITHOUT A HEARING. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON ATTACHED SCHEDULE 1.

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***"), reducing, reclassifying, and allowing the claims listed on **Schedule 1** to the Proposed Order (the "***Reduce and Reclassify Claims***") in the amounts and classifications set forth therein, and disallowing and expunging any asserted amounts in excess of the amounts set forth on **Schedule 1** to the Proposed Order.

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 Reduce and Reclassify Claims 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 Reduce and Reclassify 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.

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[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), 502, 503, and 507 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "***Bankruptcy Code***"), Rule 3007 and 3012 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "***Bankruptcy Local Rules***"), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025 (the "***Petition Date***"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order[3] which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

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***

[3] Docket No. 1055.

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 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 Reduce and Reclassify Claims along with this Objection.

13. Among other things, the Omnibus Objection Procedures Order authorizes the Reorganized Debtors to file omnibus objections on account of any of the Additional Grounds (as defined in the Omnibus Objection Procedures Order) set forth in the Objection Procedures,

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[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.").

including that Claims are inconsistent with the Reorganized Debtors' books and records or are incorrectly or improperly classified. *See* Objection Procedures ¶¶ 1(a), (d).

14. Pursuant to the Plan, the Claims Objection Deadline was initially March 29, 2026 (*i.e.*, the date that was ninety (90) days after the occurrence of the Effective Date), subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.[7]

15. On September 28, 2026, the Court entered the *Order Granting Reorganized Debtors' Third Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1780], which extended the Claims Objection Deadline through and including December 28, 2026, without prejudice to the Reorganized Debtors' right to seek a further extension.

THE REDUCE AND RECLASSIFY CLAIMS

16. This Objection seeks to reduce, reclassify, and allow (in the reduced amounts and classifications set forth on **Schedule 1** to the Proposed Order) each of the Reduce and Reclassify Claims because, based on the Reorganized Debtors' review of the Claims Register, applicable Claim Forms, and supporting documentation, each of the Reduce and Reclassify Claims: (i) seeks recovery of amounts in excess of the amounts owed by the Reorganized Debtors; and (ii) asserts an entitlement to administrative or priority treatment, in whole or in part, which such Claims are not entitled to.

17. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Thirty-Third Omnibus Objection to Certain Claims (Reduce and Reclassify Claims)*

[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.").

attached hereto as **Exhibit A** (the "***Shepard Affidavit***"), the Reorganized Debtors and their advisors determined that each of the Reduce and Reclassify Claims seek recovery of amounts in excess of the amounts owed by the Reorganized Debtors and asserts an entitlement, in whole or in part, to administrative or priority treatment to which they are not entitled. To identify the Reduce and Reclassify Claims, the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms (including any supporting documentation appended thereto); and

(b) reviewed their books and records and determined, based on such review, that each of the Reduce and Reclassify Claims seek recovery of amounts in excess of what is owed by the Reorganized Debtors, and assert entitlement to administrative or priority treatment, in whole or in part, for which the Claimants are not entitled.

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(c) permits the Court to authorize omnibus objections on grounds beyond those listed in Bankruptcy Rule 3007(d). Here, the Omnibus Objection Procedures Order authorizes the Reorganized Debtors to file omnibus objections to claims based on, *inter alia*, the "Additional Grounds" (as defined in the Omnibus Objection Procedures Order) set forth in the Objection Procedures.

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. The Objection Procedures expressly authorize the Reorganized Debtors to object to Claims that are inconsistent with their books and records and/or are incorrectly or improperly classified. Objection Procedures ¶¶ 1(a), (d).

21. Here, based on the reconciliation of the Reorganized Debtors books and records with the applicable Claim Forms (including any supporting documentation appended thereto), the Reduce and Reclassify Claims seek recovery of amounts in excess of the amounts owed by the Reorganized Debtors and, in whole or in part, assert entitlement to administrative or priority treatment on account of such Reduce and Reclassify Claims to which the Claimants are not entitled.

22. Accordingly, the Reorganized Debtors seek entry of the Proposed Order reducing and reclassifying, in whole or in part, each of the Reduce and Reclassify Claims and, allowing such claims, in the reduced amounts and classifications set forth on **Schedule 1** to the Proposed Order with any excess amount disallowed and expunged.

RESERVATION OF RIGHTS

23. 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 Reduce and Reclassify Claim or any other Claim on any other grounds that the Reorganized Debtors discover or elect to pursue.

24. 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

25. 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.

26. 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 28, 2026

Respectfully submitted,

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

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on October 28, 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-THIRD OMNIBUS OBJECTION TO CERTAIN
CLAIMS (REDUCE AND RECLASSIFY CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Thirty-Third Omnibus Objection to Certain Claims (Reduce and Reclassify Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas.

2. I am an executive vice president and group chief financial officer for the Reorganized Debtors. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors' day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the

[1] A complete list of each of the Reorganized Debtors in these chapter 11 cases (the "***Chapter 11 Cases***") and the last four digits of each Reorganized Debtor's taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors' claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

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

commencement of the Chapter 11 Cases. The facts set forth in this Affidavit are based upon my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO REDUCE AND RECLASSIFY CLAIMS

4. Article VII of the Plan authorizes the Reorganized Debtors to undertake the claims allowance process. In accordance with the claims allowance process provided for in the Plan, the Reorganized Debtors and their advisors have identified the Reduce and Reclassify Claims for which they seek entry of the Proposed Order: (i) reducing and reclassifying such claims as set forth on **Schedule 1** to the Proposed Order and allowing the Reduce and Reclassify Claims in the amounts and classifications set forth therein; and (ii) disallowing and expunging any amounts in excess of the reduced amounts set forth on **Schedule 1** to the Proposed Order.

5. The Reduce and Reclassify Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms (including any supporting documentation appended thereto); and

(b) reviewed their books and records and determined, based on such review, that each of the Reduce and Reclassify Claims seek recovery of amounts in excess of what is owed by the Reorganized Debtors, and assert entitlement to administrative or priority treatment, in whole or in part, for which the Claimants are not entitled.

[*Remainder of page intentionally left blank.*]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 28, 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-THIRD OMNIBUS OBJECTION TO CERTAIN CLAIMS (REDUCE AND RECLASSIFY CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") reducing, reclassifying, and allowing the Reduce and Reclassify Claims listed on **Schedule 1** hereto in the amounts and classifications set forth therein, and disallowing and expunging any asserted amounts in excess of those allowed amounts, 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

[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.

and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein and after due deliberation thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.

2. Each Reduce and Reclassify Claim listed on **Schedule 1** is reduced, reclassified, and allowed in the amounts and classifications set forth on **Schedule 1**. The portion of each of the Reduce and Reclassify Claim exceeding the allowed amount set forth on **Schedule 1** hereto is disallowed and expunged.

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. 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.

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

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

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

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UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

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

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;

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[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.