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 November 3, 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' Thirty-Fourth Omnibus Objection to Certain Claims (Failure to Specify Amount Claims, Reclassified Claims, and Reduce and Reclassify Claims)** [attached hereto as **Exhibit G**; substantially in the form of Docket No. 1860]

- **Notice and Reorganized Debtors' Thirty-Fifth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit H**; substantially in the form of Docket No. 1861]

- **Notice and Reorganized Debtors' Thirty-Sixth Omnibus Objection to Certain Claims (Invalid Claims)** [attached hereto as **Exhibit I**; substantially in the form of Docket No. 1862]

[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.

Furthermore, on November 3, 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' Thirty-Fourth Omnibus Objection to Certain Claims (Failure to Specify Amount Claims, Reclassified Claims, and Reduce and Reclassify Claims)** [attached hereto as **Exhibit G**; substantially in the form of Docket No. 1860]

Furthermore, on November 3, 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**:

- **Notice and Reorganized Debtors' Thirty-Fifth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit H**; substantially in the form of Docket No. 1861]

Furthermore, on November 3, 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**:

- **Notice and Reorganized Debtors' Thirty-Sixth Omnibus Objection to Certain Claims (Invalid Claims)** [attached hereto as **Exhibit I**; substantially in the form of Docket No. 1862]

Dated: November 6, 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

Thirty-Fourth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
City of Sullivan	Carrie Creek	carriec@sullivanil.us
COLLINS MOWING & LAWN CARE		collinsmowing24@yahoo.com
Crossroads Technologies		karen.castorani@crossroadstech.net
Decisions, LLC		accountsreceivable@decisions.com
DRIVEBOSS LLC		dima@drivebossllc.com
DS-SL Holdings, LLC dba SLWM, LLC		kkessler@slwmco.com
KATIE HARDWICK		Email on File
MongoDB INC		customerbankruptcy@mongodb.com
Onepak Inc		controller@onepak.com
Susan Tonkin		Email on File
WALDRON & COMPANY, INC.	Accounting at SparkEffect	accounting@sparkeffect.com
WALDRON & COMPANY, INC.		accounting@sparkeffect.com; yvonne.york@sparkeffect.com

Exhibit D

Exhibit D

Thirty-Fourth Omnibus Objection Claimants Service List

Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Avelli, Steven		Address on File			
DS-SL Holdings, LLC dba SLWM, LLC	SLWM	PO BOX 62414	BALTIMORE	MD	21264-2414

Exhibit E

Exhibit E

Thirty-Fifth Omnibus Objection Claimants Service List

Served via Electronic Mail

CreditorName	Email
FORMICA, MARIA R	Email on File
GREGG, KATIE	Email on File
Truman, Maysel	Email on File

Exhibit F

Exhibit F

Thirty-Sixth Omnibus Objection Claimant Service List

Served via Electronic Mail

CreditorName	Email
ATI VANDENBERG AMBULANCE, INC.	CHRISVANDENBERG@AMB-TRAN.COM

Exhibit G

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-FOURTH 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 December 3, 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 schedule(s) to the proposed order attached to the Omnibus Objection, the Reorganized Debtors have objected to your claim because: (a) your claim fails to specify the asserted claim amount (Schedule 1) in which case the Reorganized Debtors seek to have your claim disallowed and expunged in its entirety; (b) your claim asserts an entitlement, in whole or in part, to administrative or priority treatment (Schedule 2) which the Reorganized Debtors seek to have reclassified as a general unsecured claim with 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 Omnibus Objection.

Reorganized Debtors' rights to object to your claim as reclassified, on any other grounds, being preserved; or (c) your claim seeks recovery of amounts in excess of the amounts the Reorganized Debtors believe is owed and your claim asserts an entitlement, in whole or in part, to administrative or priority treatment (Schedule 3) such that the Reorganized Debtors seek to reduce, reclassify, and allow your claim. Please refer to the applicable schedule(s) and the corresponding section(s) of the Omnibus Objection for the specific grounds asserted against your claim.

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 **December 3, 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 identified in the Omnibus Objection attached as **Appendix 1**. 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 **December 3, 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 either **disallow and expunge** your Claim(s), **reclassify** your Claim(s), or **reduce, reclassify, and allow** your Claim(s) based 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 is attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the 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 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;

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

the following contact information for the responding party:

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

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 **December 3, 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.**

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

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW, RECLASSIFY, OR REDUCE AND RECLASSIFY THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED, RECLASSIFIED, OR REDUCED AND RECLASSIFIED WITHOUT A HEARING. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON ATTACHED SCHEDULES 1, 2, AND 3.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

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

The above-captioned reorganized debtors (prior to the Effective Date,[2] collectively, the "***Debtors***" and after the Effective Date, collectively, the "***Reorganized Debtors***") respectfully state the following in support of this omnibus claims objection (this "***Objection***").

RELIEF REQUESTED

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

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each Disputed Claim that is the subject of this Objection was asserted on a proof of claim form (each, a "***Proof of Claim***" and collectively, the "***Claim Forms***") filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors' estates based on the filing of a Proof of Claim, the holders of the Disputed Claims (each

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the "***Plan***"), as applicable.

a "***Claimant***" and collectively the "***Claimants***") have submitted to the Court's jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory and legal predicates for the relief requested herein are sections 105(a), 502, 503, 506, and 507 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "***Bankruptcy Code***"), Rules 3007 and 3012 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "***Bankruptcy Local Rules***"), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

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

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

[3] Docket No. 1055.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the "***Bar Date Order***") setting, *inter alia*, (i) October 1, 2025, at 5:00 p.m. (prevailing Central Time), as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the "***General Bar Date***"); and (ii) February 16, 2026, at 5:00 p.m. (prevailing Central Time) as the deadline for all governmental units (as defined in section 101(27) of the Bankruptcy Code) to assert a claim (as defined in section 101(5) of the Bankruptcy Code) that arose on or prior to the Petition Date (the "***Governmental Bar Date***" and together with the General Bar Date, as applicable, depending on whether the claimant is a governmental unit or non-governmental unit, the "***Claims Bar Date***").

9. The Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, "set forth with specificity the legal and factual basis for the alleged claim," and "include supporting documentation or an explanation as to why such documentation is not available." Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Bar Date Order provides that the relevant claimant "shall not be treated as a creditor with respect to such claim for purposes of voting and ***distribution***." *Id.* at ¶ 20 (emphasis added).

10. On August 23, 2025, the Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "***Claims and Noticing Agent***"), served notice of the Claims Bar Date (the "***Bar Date Notice***") to potential claimants in accordance with the procedures set forth in the Bar Date Order, and, as necessary, supplemented such service. *See* Bar Date

Affidavits of Service.[4] Also, as certified at Docket No. 142, in accordance with the Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

11. The Reorganized Debtors also listed numerous claims in their Schedules[5] (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the "***Claims***"), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain "first day" orders and other orders entered in the Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors' Claims and Noticing Agent (the "***Claims Register***").[6]

12. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the "***Omnibus Objection Procedures Order***") approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as **Exhibit 1** (the "***Objection***

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[4] "***Bar Date Affidavits of Service***" means, collectively, (i) *Certificate of Service* [Docket No. 113]; (ii) *Certificate of Service* [Docket No. 353]; (iii) *Supplemental Certificate of Service* [Docket No. 400]; (iv) *Supplemental Certificate of Service* [Docket No. 442]; (v) *Supplemental Certificate of Service* [Docket No. 492]; (vi) *Supplemental Certificate of Service* [Docket No. 602]; (vii) *Supplemental Certificate of Service* [Docket No. 603]; (viii) *Supplemental Certificate of Service* [Docket No. 700]; (ix) *Supplemental Certificate of Service* [Docket No. 727]; (x) *Supplemental Certificate of Service* [Docket No. 1067]; (xi) *Supplemental Certificate of Service* [Docket No. 1127]; (xii) *Supplemental Certificate of Service* [Docket No. 1143]; (xiii) *Supplemental Certificate of Service* [Docket No. 1148]; (xiv) *Supplemental Certificate of Service* [Docket No. 1184]; (xv) *Supplemental Certificate of Service* [Docket No. 1285]; and (xvi) *Supplemental Certificate of Service* [Docket No. 1320].

[5] On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the "***Schedules***") and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

[6] Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) ("A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.").

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

13. Among other things, the Omnibus Objection Procedures Order authorizes the Reorganized Debtors to file omnibus objections on account of any of the Additional Grounds (as defined in the Omnibus Objection Procedures Order) set forth in the Objection Procedures, including that Claims are inconsistent with the Reorganized Debtors' books and records, fail to specify the asserted Claim amount, or are incorrectly or improperly classified. See Objection Procedures ¶¶ 1(a), (b), (d).

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

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

THE DISPUTED CLAIMS

16. The Reorganized Debtors' review of the Claims Register, applicable Claim Forms and supporting documentation, and their books and records allowed them to identify the Disputed Claims. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors'*

[7] *See* Plan, p. 3 (defining "Claims Objection Deadline" as "ninety (90) days after the Effective Date … which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.").

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

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

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

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

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

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

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

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

18. Consistent with the Objection Procedures, each of the schedules appended to the Proposed Order includes only Claims subject to a common basis for objection. Each schedule identifies the pertinent section and page of this Objection and states the claim-specific basis for the requested relief. See Objection Procedures ¶ 4.

BASIS FOR RELIEF

19. Section 502 of the Bankruptcy Code provides, in pertinent part, that: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest … objects." 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law …." 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007(c) permits the Court to authorize omnibus objections on grounds beyond those listed in Bankruptcy Rule 3007(d). Here, the Omnibus Objection Procedures Order authorizes the Reorganized Debtors to file omnibus objections to claims based on, *inter alia*, the "Additional Grounds" (as defined in the Omnibus Objection Procedures Order) set forth in the Objection Procedures.

20. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes prima facie evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g.*, *In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of prima facie validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim's legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its

claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, "the ultimate burden of proof always lies with the claimant." *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep't of Rev.*, 530 U.S. 15 (2000)).

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

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

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

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

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

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

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

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

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

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

RESERVATION OF RIGHTS

29. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates, including, but not limited to, additional objections (on any other grounds, including, but not limited to, the amount, validity, or

enforceability of such Claims) with respect to the Reclassified Claims. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each Disputed Claim or any other Claim on any other grounds that the Reorganized Debtors discover or elect to pursue.

30. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

31. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

32. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at https://www.veritaglobal.net/ModivCare.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: November 3, 2026

Respectfully submitted,

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

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on November 3, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

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

Exhibit A

Shepard Affidavit

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

AFFIDAVIT OF KENNETH SHEPARD IN SUPPORT OF REORGANIZED DEBTORS' THIRTY-FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (FAILURE TO SPECIFY AMOUNT CLAIMS, RECLASSIFIED CLAIMS, AND REDUCE AND RECLASSIFY CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

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

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

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

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

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

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

OBJECTION TO DISPUTED CLAIMS

4. Article VII of the Plan authorizes the Reorganized Debtors to undertake the claims allowance process. In accordance with the claims allowance process provided for in the Plan, the Reorganized Debtors and their advisors have identified the Disputed Claims for which they seek entry of the Proposed Order (i) disallowing and expunging the Failure to Specify Amount Claims on **Schedule 1**; (ii) reclassifying the Reclassified Claims on **Schedule 2**; and (iii) reducing, reclassifying, and allowing the Reduce and Reclassify Claims on **Schedule 3** in the amounts and classifications set forth therein, with any excess amounts disallowed and expunged in their entirety.

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

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

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

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

[*Remainder of page intentionally left blank.*]

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

Dated: November 3, 2026

/s/ Kenneth Shepard
Name: Kenneth Shepard
Title: EVP and Group Chief Financial Officer
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

ORDER GRANTING REORGANIZED DEBTORS' THIRTY-FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (FAILURE TO SPECIFY AMOUNT CLAIMS, RECLASSIFIED CLAIMS, AND REDUCE AND RECLASSIFY CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") (a) disallowing and expunging the Failure to Specify Amount Claims listed on **Schedule 1** hereto; (b) reclassifying the Reclassified Claims listed on **Schedule 2** hereto; and (c) reducing, reclassifying, and allowing the Reduce and Reclassify Claims listed on **Schedule 3** hereto in the amounts and classifications set forth therein, with any excess amounts disallowed and expunged, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing

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

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

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

ORDERED, ADJUDGED, AND DECREED THAT:

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

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

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

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

5. The Claims and Noticing Agent is authorized to update the Claims Register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.

6. Except to the extent expressly adjudicated herein, nothing in the Objection or this Order waives the Reorganized Debtors' rights to object to Claims on other grounds or constitutes an admission of liability.

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

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

9. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

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

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

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

_____
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

(FAILURE TO SPECIFY AMOUNT CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	Avelli, Steven	ModivCare Inc.	473	09/18/2025	General Unsecured Priority Secured Admin Priority Total	Amount Not Stated

SCHEDULE 2

(RECLASSIFIED CLAIMS)

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

SCHEDULE 3

(REDUCE AND RECLASSIFY CLAIMS)

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

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.

Exhibit H

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-FIFTH 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 December 3, 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 should be disallowed and expunged in its entirety because your Claim either (i) has been satisfied in full during the course of the Chapter 11 Cases such that no further distribution is owing

[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.

on account of your Claim, or (ii) asserts an entitlement to payment arising under an Employee Plan, which was satisfied by virtue of the assumption of all Employee Plans pursuant to the Plan.

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 **December 3, 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 identified in the Omnibus Objection attached as **Appendix 1**. 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 **December 3, 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) based 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 is attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the 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 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;

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

the following contact information for the responding party:

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

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 **December 3, 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.**

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-FIFTH 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 either: (i) 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; or (ii) asserts an entitlement to payment arising under an Employee Plan, which was satisfied by virtue of the assumption of all Employee Plans pursuant to the Plan.

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

[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) 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 "***Claims 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 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

[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]; (viii) *Supplemental Certificate of Service* [Docket No. 727]; (ix) *Supplemental Certificate of Service* [Docket No. 1067]; (x) *Supplemental Certificate of Service* [Docket No. 1127]; (xi) *Supplemental Certificate of Service* [Docket No. 1143]; (xii) *Supplemental Certificate of*

with the Claims 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 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

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Service [Docket No. 1148]; (xiii) *Supplemental Certificate of Service* [Docket No. 1184]; (xiv) *Supplemental Certificate of Service* [Docket No. 1285]; and (xv) *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.").

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 either: (i) 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; or (ii) asserts an entitlement to payment arising under an Employee Plan, which was satisfied by virtue of the assumption of all Employee Plans pursuant to the Plan.

16. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Thirty-Fifth 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 either: (i) been satisfied in full during the course of the Chapter 11 Cases; or (ii) asserts an entitlement to

[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.").

payment arising under an Employee Plan, which was satisfied by virtue of the assumption of all Employee Plans pursuant to the Plan.

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;

(b) consulted with counsel regarding the treatment of the Employee Plans under the Plan; and

(c) determined that each of the Satisfied Claims either: (i) had been 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; or (ii) asserts an entitlement to payment arising under an Employee Plan, which was satisfied by virtue of the assumption of all Employee Plans pursuant to the Plan.

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 Such That 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).

23. Each of the Satisfied Claims, except Proof of Claim Number 686 (addressed below), 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 owing on account of such claims.

24. Proof of Claim Number 686, filed by Claimant Maysel Truman, asserts a claim on account of an Employee Plan (specifically, a 401(k) plan). Pursuant to section 8.5 of the Plan all Employee Plans were assumed, thus such claim flows through the Chapter 11 Cases and is

satisfied. *See* Plan, § 8.5 (providing that "[a]ll Employee Plans that exist as of the Petition Date shall be assumed on the Effective Date ….").

25. 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

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 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.

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: November 3, 2026

Respectfully submitted,

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

HUNTON ANDREWS KURTH LLP
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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on November 3, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

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

Exhibit A

Shepard Affidavit

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS' THIRTY-FIFTH
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-Fifth 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;

(b) consulted with counsel regarding the treatment of the Employee Plans under the Plan; and

(c) determined that each of the Satisfied Claims either: (i) had been 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; or (ii) asserts an entitlement to payment arising under an Employee Plan, which was satisfied by virtue of the assumption of all Employee Plans pursuant to the Plan.

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

Dated: November 3, 2026

/s/Kenneth Shepard
Name: Kenneth Shepard
Title: EVP and Group Chief Financial Officer
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

ORDER GRANTING REORGANIZED DEBTORS' THIRTY-FIFTH 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

---

[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.

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 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	FORMICA, MARIA R	All Metro Health Care Services, Inc.	686	09/24/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$2,793.80
					Total	$2,793.80
2	GREGG, KATIE	ModivCare Inc.	1041	09/30/2025	General Unsecured	$3,497.64
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$3,497.64
3	Truman, Maysel	ModivCare Inc.	1275	09/30/2025	General Unsecured	$1,087.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,087.00

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 I

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-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 December 3, 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.

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

[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.

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 **December 3, 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 identified in the Omnibus Objection attached as **Appendix 1**. 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 **December 3, 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) based 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 is attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the 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 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;

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

the following contact information for the responding party:

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

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 **December 3, 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.**

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-SIXTH 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.

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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) 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).

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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.").

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' Thirty-Sixth 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 assert 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: November 3, 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 November 3, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

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

Exhibit A

Shepard Affidavit

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

AFFIDAVIT OF KENNETH SHEPARD IN SUPPORT OF REORGANIZED DEBTORS' THIRTY-SIXTH 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' Thirty-Sixth 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: November 3, 2026

/s/Kenneth Shepard
Name: Kenneth Shepard
Title: EVP and Group Chief Financial Officer
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

ORDER GRANTING REORGANIZED DEBTORS' THIRTY-SIXTH 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)

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Claim Amount
1	ATI VANDENBERG AMBULANCE, INC.	ModivCare Inc.	926	09/29/2025	General Unsecured	$10,992.15
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$10,992.15

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.