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' OBJECTION TO FRANCES DOUGLAS'S MOTION FOR RELIEF FROM STAY AND RESERVATION OF RIGHTS
[Relates to Docket Nos. 1805, 1806, and 1832]

The above-captioned reorganized debtors (prior to the Effective Date,[2] collectively, the "***Debtors***" and after the Effective Date, collectively, the "***Reorganized Debtors***"), by and through their undersigned counsel, hereby submit this Objection (this "***Objection***"),[3] which seeks entry of an order, substantially in the form attached hereto (the "***Proposed Order***"), denying the *Motion to Lift the Automatic Stay or, in the Alternative, to Modify or Waive the Stay to Permit Continuation of Pending Federal Civil Action* [Docket No. 1805] and *Douglas' Update to the Court to Uplift*

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

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

[3] This Objection supplements the *Reorganized Debtors' Preliminary Response to Frances Douglas's Motion for Relief from Stay and Reservation of Rights* [Docket No. 1832] (the "***Preliminary Response***").

the Automatic Stay [Docket No. 1806] (together, the "***Motion***") filed by Frances Douglas (the "***Movant***"), and, in support thereof, respectfully state as follows:

OBJECTION

1. The Reorganized Debtors submit this Objection to the Motion after the Reorganized Debtors and the Movant were unable to reach a consensual resolution of the Motion. *See* Preliminary Response, ¶ 1.

2. The Motion should be denied for two reasons: (i) it is procedurally deficient because the automatic stay ceased to be in effect on the occurrence of the Effective Date and the Motion fails to seek relief from the applicable Plan Injunction and Plan discharge;[4] and (ii) even if the Court were inclined to construe the Motion as a request for relief from the Plan Injunction and the Plan discharge,[5] no cause exists to grant Movant such relief.

3. With respect to the latter issue, he Debtors provided the Movant with notice of the commencement of the Chapter 11 Cases and of the Claims Bar Date. *See Certificate of Service* [Docket No. 353] (the "***CoS***"), at p. 659 ("Name on File – ID 16125862").[6] Despite receiving timely notice of the commencement of the Chapter 11 Cases and the Claims Bar Date, Movant failed to file a proof of claim.

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[4] *See* Plan, § 10.4 (providing "all injunctions or stays arising under … section 105 or 362 of the Bankruptcy Code … shall remain in full force and effect ***until the later of the Effective Date*** and the date indicated in the order providing for such injunction or stay.") (emphasis added).

[5] "***Plan Injunction***" means the injunctions set forth in Section 10.5 of the Plan.

[6] In accordance with the *Order (A) Authorizing the Debtors to (I) File a Consolidated Creditor Matrix and List of the 30 Largest Creditors, and (II) to Redact Certain Personally Identifiable Information; (B) Waiving the Requirement to File a List of Equity Security Holders; (C) Authorizing Service of Parties in Interest By Electronic Mail; (D) Approving the Form and Manner of Notifying Creditors of the Commencement of the Chapter 11 Cases; and (E) Granting Related Relief* [Docket No. 53] (the "***Creditor Matrix Order***"), the Movant's name is redacted on the CoS and thus the entry reflecting service on the Movant is entry reflected on page 659 of the CoS identifying the Movant as "Name on File – ID 16125862".

4. The consequences of failing to file a proof of claim are clearly set forth in both the Claims Bar Date Order and the Plan. *See* Claims Bar Date Order, ¶ 20 ("any Claimant that is required to file a Proof of Claim in the Chapter 11 Cases … but that fails to do so properly by the applicable Bar Date, ***shall not be treated as a creditor with respect to such claim for purposes of voting and distribution***.") (emphasis added); Plan, § 10.3 (Pursuant to Section 1141(d) of the Bankruptcy Code … the distributions, rights, and treatment that are provided in this Plan shall be in complete satisfaction, ***discharge, and release***, effective as of the Effective Date, of ***Claims***, Interests, and ***Causes of Action*** of any nature whatsoever … ***whether or not*** (i) ***a Proof Claim based upon such debt or right is Filed or deemed Filed pursuant to section 501 of the Bankruptcy Code*** ….") (emphases added).

5. The Plan Injunction prevents Movant from pursuing any claims against the Reorganized Debtors or their Estates and Movant's failure to file a proof of claim resulted in the discharge of Movant's claim and the forfeiture of her entitlement, if any, to recover against the Reorganized Debtors or their Estates. Accordingly, no cause exists to grant Movant relief from the Plan Injunction or the Plan discharge, and the Motion should be denied.

6. For the reasons set forth above, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining this Objection and denying the Motion.

[*Remainder of page intentionally left blank.*]

Dated: November 11, 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 11, 2026, a true and correct copy of the foregoing document, was served through the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices and by first-class mail on: Frances Douglas P.O. Box 74 Startex, SC 29377.

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

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 SUSTAINING REORGANIZED DEBTORS' OBJECTION TO MOTION TO LIFT THE AUTOMATIC STAY, OR, IN THE ALTERNATIVE, TO MODIFY OR WAIVE THE STAY TO PERMIT CONTINUATION OF PENDING FEDERAL CIVIL ACTION FILED BY FRANCES DOUGLAS
[Relates to Docket Nos. 1805, 1806]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") denying the *Motion to Lift the Automatic Stay, or in the Alternative, to Modify or Waive the Stay to Permit Continuation of Pending Federal Civil Action* [Docket No. 1805] and *Douglas's Update to the Court to Uplift the Automatic Stay* [Docket No. 1806] (together, the "***Motion***"), all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Motion, and the relief requested therein, and the Objection 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 Motion and the Objection in this district is proper pursuant to 28

[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.

U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion and the Objection and opportunity for a hearing on the Motion and the Objection were appropriate under the circumstances and that no other or further notice is necessary; 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 denying the Motion, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is SUSTAINED.

2. The Motion is DENIED.

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

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

Signed: _____, 2026

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UNITED STATES BANKRUPTCY JUDGE