

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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	:	<b>Chapter 11</b>
<b>In re</b>	:	
	:	<b>Case No. 24-10164 (KBO)</b>
<b>CANO HEALTH, INC.,</b>	:	
	:	
<b>Debtor.<sup>1</sup></b>	:	<b>Re: Docket No. 1627</b>
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**CERTIFICATION OF COUNSEL REGARDING ORDER (I) EXTENDING THE CLAIMS OBJECTION DEADLINE AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On December 22, 2025, Cano Health, Inc. (together with the Closed Case Debtors, the “**Reorganized Debtors**”), as the Reorganized Debtor in the above-captioned chapter 11 case, filed the *Motion of Reorganized Debtors for Entry of Order (I) Extending the Claims Objection Deadline and (II) Granting Related Relief* [Docket No. 1627] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached thereto as **Exhibit A** was a proposed form of order granting the relief requested in the Motion (the “**Proposed Order**”).
2. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, objections or responses to the relief requested in the Motion were to be made in writing and filed with the Court on or before January 8, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”).

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<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is Cano Health, Inc. (4224) (“**CHI**”). On August 13, 2024, the Court entered an order closing the chapter 11 cases of CHI’s debtor affiliates, (collectively, the “**Closed Case Debtors**”). A complete list of the Closed Case Debtors may be obtained on the website of the Reorganized Debtor’s claims and noticing agent at <https://veritaglobal.net/canohealth>. The Reorganized Debtor’s mailing address is 9725 NW 117th Avenue, Miami, Florida 33178.



3. Prior to the Objection Deadline, the Reorganized Debtors received informal comments (the “**Comments**”) to the relief requested in the Motion from K&L Marketing, Inc., Abraham Leonorovitz, and Aaron Knobel (collectively, the “**K&L Parties**”). Other than the Comments, no objection or responsive pleading to the Motion has appeared on the Court’s docket in this chapter 11 case, and the Reorganized Debtors have received no informal responses to the Motion.

4. The Reorganized Debtors have prepared a revised form of Proposed Order (the “**Revised Order**”) that resolves the Comments. A copy of the Revised Order is attached hereto as **Exhibit 1**. The Revised Order has been circulated to the K&L Parties, and the K&L Parties do not object to the entry of the Revised Order. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit 1, at its earliest convenience.

Dated: January 12, 2025  
Wilmington, Delaware

/s/ James F. McCauley

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*Attorneys for the Reorganized Debtors*

**EXHIBIT 1**

**Revised Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>CANO HEALTH, INC.,</b>	:	<b>Case No. 24– 10164 (KBO)</b>
	:	
<b>Debtor.<sup>1</sup></b>	:	<b>Re: Docket No. 1627</b>
	X	

**ORDER (I) EXTENDING THE CLAIMS OBJECTION  
DEADLINE AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)<sup>2</sup> of Cano Health, Inc. (together with the Closed Case Debtors, the “**Reorganized Debtors**,” and prior to the Effective Date (as defined below), the “**Debtors**”), as Reorganized Debtor in the above-captioned chapter 11 case, for entry of an order extending the Claim Objection Deadline by 180 days, without prejudice to the Reorganized Debtors’ right to Request Additional Extensions, and granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and §1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

Notice Parties; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and upon any hearing held on the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing the relief requested in the Motion is in the best interests of the Reorganized Debtors, the Debtors' estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The Motion is granted to the extent set forth herein.
2. The Claims Objection Deadline is hereby extended through and including June 22, 2026.
3. Notwithstanding paragraph 2 hereof, solely with respect to claims filed by K&L Marketing, Inc., Abraham Leonorovitz, and Aaron Knobel (collectively, the "**K&L Parties**"), the Claims Objection Deadline shall be extended through March 1, 2026; *provided that* the Claims Objection Deadline with respect to the K&L Parties may be further extended by agreement between the Debtors and the K&L Parties.
4. This Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline, including with respect to the K&L Parties if the Debtors and the K&L Parties are unable to agree to a consensual extension.
5. The Reorganized Debtors are authorized to take all reasonable actions necessary or appropriate to implement the relief granted in this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

**Exhibit 2**

**Redline**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>CANO HEALTH, INC.,</b>	:	<b>Case No. 24– 10164 (KBO)</b>
	:	
<b>Debtor.<sup>1</sup></b>	:	<b>Re: Docket No. <del>1627</del> <a href="#">1627</a></b>
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DEADLINE AND (II) GRANTING RELATED RELIEF**

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

Notice Parties; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and upon any hearing held on the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing the relief requested in the Motion is in the best interests of the Reorganized Debtors, the Debtors' estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The Motion is granted to the extent set forth herein.
2. The Claims Objection Deadline is hereby extended through and including June 22, 2026.
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34. This Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline, including with respect to the K&L Parties if the Debtors and the K&L Parties are unable to agree to a consensual extension.
45. The Reorganized Debtors are authorized to take all reasonable actions necessary or appropriate to implement the relief granted in this Order.

56. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.