IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CANO HEALTH, INC.,	Case No. 24-10164 (KBO)
Reorganized Debtors.[1]	(Jointly Administered)

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION BY AND BETWEEN THE REORGANIZED DEBTORS AND K&L MARKETING, INC. REGARDING ASSERTED CLAIMS

The undersigned hereby certifies as follows:

1. Beginning on February 4, 2024 (the "**Petition Date**"), Cano Health, Inc. and certain of its affiliates (the "**Debtors**," and since the Effective Date (as defined below), the "**Reorganized Debtors**") commenced voluntary cases under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the "**Court**").

2. Prior to the Petition Date, K&L Marketing, Inc. ("**K&L Marketing**," and together with the Debtors,' the "**Parties**") filed a complaint (the "**Complaint**") commencing the action captioned *Leonorovitz v. Exposito,* Case No. 2022-009069-CA (the "**Florida Action**") in the Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida (the "**Florida Court**"). K&L Marketing is a named plaintiff in the Florida Action and certain of the Debtors are named defendants. The Complaint asserts, among other things, breach of contract claims against certain of the Debtors.

[1] 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.

2410164260317000000000002

3. On March 5, 2024, the Court entered and order [Docket No. 259] establishing, among other things, April 22, 2024 at 5:00 p.m. as the deadline for claimants to file proofs of claim in respect of prepetition claims against the Debtors (the "**General Bar Date**").

4. Prior to the General Bar Date, K&L Marketing filed proof of claim numbers 483, 486, 487, 488, 489, 491, 492, 493, 495 (the "**Asserted Claims**"). Each of the Asserted Claims asserts a general unsecured claim in the amount of $8,038,989.77 for amounts allegedly owing in connection with the claims asserted in the Florida Action. The Asserted Claims are identical, except that they are asserted against different Debtors.

5. On June 28, 2024, the Bankruptcy Court entered an order [Docket No. 1148] confirming the *Modified Fourth Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors* [Docket No. 1125] (the "**Plan**"). On the same day, the Plan was substantially consummated and became effective. *See* Docket No. 1152.

6. On January 13, 2025, the Court entered an order [Docket No. 1627], extending the Debtors deadline to object to the Asserted Claims through and including March 1, 2025, without prejudice to the Parties rights to further extend such deadline.

7. The Reorganized Debtors and K&L Marketing have engaged in discussions and negotiations regarding, among other things, the Florida Action and the Asserted Claims and have entered into that certain *Stipulation by and Between the Reorganized Debtors and K&L Marketing, Inc. Regarding Asserted Claims* to resolve the disputes among them (the "**Stipulation**"). A proposed form of order approving the Stipulation is attached hereto as **Exhibit A** (the "**Proposed Order**"), and a true and correct copy of the Stipulation is Attached to the Proposed Order as **Exhibit 1**.

WHEREFORE, the Parties respectfully request that the Court enter an order, in a form substantially similar to the Proposed Order attached hereto as **Exhibit A**, approving the Stipulation.

Dated: March 17, 2026
Wilmington, Delaware

/s/ James F. McCauley

RICHARDS, LAYTON & FINGER, P.A.
Mark D. Collins (No. 2981)
Michael J. Merchant (No. 3854)
Amanda R. Steele (No. 5530)
James F. McCauley (No. 6991)
920 North King Street
Wilmington, Delaware 19801
Telephone: 302-651-7700
Email: collins@rlf.com
merchant@rlf.com
steele@rlf.com
mccauley@rlf.com
-and-

WEIL, GOTSHAL & MANGES LLP
Gary T. Holtzer (admitted *pro hac vice*)
Jessica Liou (admitted *pro hac vice*)
Matthew P. Goren (admitted *pro hac vice*)
Kevin Bostel (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Email: gary.holtzer@weil.com
jessica.liou@weil.com
matthew.goren@weil.com
kevin.bostel@weil.com

Attorneys for the Reorganized Debtors

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CANO HEALTH, INC.,	Case No. 24-10164 (KBO)
Reorganized Debtors.[1]	(Jointly Administered)

ORDER APPROVING STIPULATION BY AND BETWEEN THE REORGANIZED DEBTORS AND K&L MARKETING, INC. REGARDING ASSERTED CLAIMS

Upon consideration of the *Stipulation by and Between the Reorganized Debtors and K&L Marketing, Inc. Regarding Asserted Claims*, attached hereto as **Exhibit A** (the "**Stipulation**"); and the Court having jurisdiction to consider the Stipulation pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having reviewed the Stipulation,

IT IS HEREBY ORDERED THAT:

1. The Stipulation is Approved.

[1] 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.

2. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Exhibit A

Stipulation

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CANO HEALTH, INC.,	Case No. 24-10164 (KBO)
Reorganized Debtors.[1]	(Jointly Administered)

STIPULATION BY AND BETWEEN THE REORGANIZED DEBTORS AND K&L MARKETING, INC. REGARDING ASSERTED CLAIMS

This stipulation (the "**Stipulation**") is made and entered into as of March 17, 2026, by and between Cano Health, Inc. and certain of its affiliates (the "**Reorganized Debtors**," and prior to the Effective Date (as defined below), the "**Debtors**"), and K&L Marketing, Inc. ("**K&L Marketing**," and together with the Reorganized Debtors, the "**Parties**"), by and through their undersigned counsel, who hereby stipulate and agree as follows:

RECITALS

WHEREAS, beginning on February 4, 2024 (the "**Petition Date**"), the Debtors commenced voluntary cases under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the "**Bankruptcy Court**");

WHEREAS, prior to the Petition Date, K&L Marketing filed a complaint (the "**Complaint**") commencing the action captioned *Leonorovitz v. Exposito,* Case No. 2022-009069-CA (the "**Florida Action**") in the Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida (the "**Florida Court**");

[1] 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.

WHEREAS, K&L Marketing is a named plaintiff in the Florida Action and certain of the Debtors are named defendants;

WHEREAS, the Complaint asserts, among other things, breach of contract claims against certain of the Debtors;

WHEREAS, on March 5, 2024, the Court entered and order [Docket No. 259] establishing, among other things, April 22, 2024 at 5:00 p.m. as the deadline for claimants to file proofs of claim in respect of prepetition claims against the Debtors (the "**General Bar Date**");

WHEREAS, prior to the General Bar Date, K&L Marketing filed proof of claim numbers 483, 486, 487, 488, 489, 491, 492, 493, and 495 (the "**Asserted Claims**"), each of which asserts a general unsecured claim in the amount of $8,038,989.77 for amounts allegedly owing in connection with the claims asserted in the Florida Action.

WHEREAS, the Asserted Claims are identical, except that they are asserted against different Debtors;

WHEREAS, on June 28, 2024, the Bankruptcy Court entered an order [Docket No. 1148] confirming the *Modified Fourth Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors* [Docket No. 1125] (the "**Plan**"), and on the same day, the Plan was substantially consummated and became effective. *See* Docket No. 1152;

WHEREAS, on January 13, 2025, the Court entered an order [Docket No. 1627], extending the Debtors deadline to object to the Asserted Claims through and including March 1, 2025, without prejudice to the Parties rights to further extend such deadline;

WHEREAS, the Reorganized Debtors and K&L Marketing have engaged in discussions and negotiations regarding, among other things, the Florida Action and the Asserted Claims and have agreed to resolve the disputes among them as follows;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED BETWEEN AND AMONG THE PARTIES AS FOLLOWS:

1. This Stipulation shall be binding and enforceable upon the date the Court enters and order approving the Stipulation (the "**Stipulation Effective Date**").

2. Upon the Stipulation Effective date, (i) claim number 493 shall be reduced and Allowed as a NON-RSA GUC Claim in the amount of $4,500,000 (the "**Allowed Claim**"), and (ii) each of the Asserted Claims other than the Allowed Claim shall be disallowed and expunged in its entirety.

3. Kurtzman Carson Consultants, LLC (d/b/a Verita Global), the Court appointed claims and noticing agent in the Debtors' chapter 11 cases, shall be authorized to modify the claims register to reflect the agreements herein.

4. Within thirty (30) days of the Stipulation Date, K&L Marketing shall voluntarily dismiss the Florida Action with respect to all Debtor defendants, with prejudice. The automatic stay provided under section 362(a) of the Bankruptcy Code and the injunctions set forth in Article X of the Plan (the "**Plan Injunction**") are modified for the limited purposes of allowing K&L Marking to voluntarily dismiss the Florida Action. Except as set forth herein, all other provisions of the Plan Injunction, the automatic stay and other provisions of the Bankruptcy Code, including, without limitation, those provisions prohibiting the commencement or continuation of any judicial proceeding against the Debtors that was or could have been commenced prior to the Petition Date, and those provisions prohibiting any act to collect, assess, or recover a claim that arose prior to the Petition Date from the respective estates and/or assets or property of any of the Debtors, shall remain in full force and effect. For the avoidance of doubt, notwithstanding anything contained in this Stipulation, the order approving this Stipulation, and any modification of the automatic stay

granted thereunder, no party, shall be authorized to collect, assess, or recover any claim against the Debtors, and the automatic stay shall continue to prohibit any such action.

5. Each of the Parties hereto represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

6. This Stipulation and all the provisions hereof shall be binding upon and shall inure to the benefit of the Parties and each of their respective executors, heirs, successors, and assigns.

7. This Stipulation constitutes the entire agreement between the Parties with respect to the subject matter hereof, and supersedes any prior agreements and understandings, both written and oral, thereof.

8. The Court shall retain exclusive jurisdiction with respect to all disputes or controversies arising from or related to this Stipulation.

9. This Stipulation may be executed by the Parties in separate counterparts, each of which shall be deemed an original, but all of which, when taken together, shall constitute one and the same instrument. This Stipulation may be executed by exchange of facsimile or electronic signatures (in PDF or comparable format), which shall be deemed original signatures.

STIPULATED AND AGREED:

Dated: March 17, 2026

/s/ *David Rosenblatt*
STOK KON & BRAVERMAN, P.A.
Joshua Kon
David Rosenblatt
Moshe Katz
1 East Broward Blvd., Suite 915
Fort Lauderdale, Florida 33301
Telephone: (954) 237-1777
Email: JKon@stoklaw.com
drosenblatt@stoklaw.com
mkatz@stoklaw.com

Counsel to K&L Marketing

Dated: March 17, 2026

/s/ James F. McCauley
RICHARDS, LAYTON & FINGER, P.A.
Mark D. Collins (No. 2981)
Michael J. Merchant (No. 3854)
Amanda R. Steele (No. 5530)
James F. McCauley (No. 6991)
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
Email: collins@rlf.com
merchant@rlf.com
steele@rlf.com
mccauley@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP
Gary T. Holtzer (admitted *pro hac vice*)
Jessica Liou (admitted *pro hac vice*)
Matthew P. Goren (admitted *pro hac vice*)
Kevin Bostel (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Email: gary.holtzer@weil.com
jessica.liou@weil.com
matthew.goren@weil.com
kevin.bostel@weil.com

Attorneys for the Reorganized Debtors