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

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| **In re** | : | **Chapter 11** |
| | : | **Case No. 24–10164 (KBO)** |
| **CANO HEALTH, INC.,** | : | |
| | : | **Hearing Date: May 29, 2026 at 11:00 a.m. (ET)** |
| **Reorganized Debtor.**[1] | : | **Objection Deadline: May 13, 2026 at 4:00 p.m. (ET)** |

**MOTION OF REORGANIZED DEBTORS FOR ENTRY OF SEVENTH ORDER EXTENDING PERIOD WITHIN WHICH THE REORGANIZED DEBTORS AND LITIGATION TRUST MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND FED. R. BANKR. P. 9027 AND GRANTING RELATED RELIEF**

Cano Health, Inc. (together with the Closed Case Debtors, the "**Reorganized Debtors**," and prior to the Effective Date (as defined below), the "**Debtors**"), as the Reorganized Debtor in the above-captioned chapter 11 case, respectfully represents as follows:

## Relief Requested

1. By this motion (the "**Motion**"), pursuant to 28 U.S.C. § 1452 and Rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), the Reorganized Debtors request the entry of an order (i) extending the time by which the Reorganized Debtors and the Litigation Trust[2] may file notices of removal by approximately 120 days, through and including August 28, 2026, without prejudice to the Reorganized Debtors' and Litigation Trust's rights to seek further extensions, and (ii) granting related relief.[3] The

[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] Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan (as defined below).

[3] The current time period within which the Debtors may file any removal notices under Bankruptcy Rule 9027(a)(2) expires on April 30, 2026 (the "**Removal Deadline**") pursuant to the *Sixth Order Extending Period Within Which*

Reorganized Debtors and Litigation Trust request that the proposed extended Removal Deadline apply to all matters specified in Bankruptcy Rules 9027(a)(2) and 9027(a)(3).

2. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the "**Proposed Order**").

## Background

3. Beginning on February 4, 2024 (the "**Petition Date**"), the Debtors each commenced with the Court a voluntary case under chapter 11 of the Bankruptcy Code. No trustee or examiner was appointed in the Debtors' chapter 11 cases.

4. The Debtors' chapter 11 cases were jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

5. On February 21, 2024, the United States Trustee for Region 3 (the "**U.S. Trustee**") appointed the Official Committee of Unsecured Creditors (the "**Creditors' Committee**").[4]

6. On June 28, 2024, the Court entered an order [Docket No. 1148] (the "**Confirmation Order**") confirming the *Modified Fourth Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors* [Docket No. 1125] (including any exhibits, schedules, and supplements thereto and as may be amended, restated, supplemented, or otherwise modified from time to time in accordance with the terms thereof, the "**Plan**"). On the

*Reorganized Debtors and Litigation Trust May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [Docket No. 1634] (the "**Sixth Removal Extension Order**") entered on January 13, 2026. Pursuant to Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**"), the filing of this Motion prior to the Removal Deadline automatically extends the Removal Deadline until such time as the court rules on the Motion. *See* Del. Bankr. L.R. 9006-2.

[4] Pursuant to section 12.3 of the Plan, except for certain limited purposes not relevant here, the Creditors' Committee dissolved on the Effective Date. See Plan § 12.3.

same day (the "**Effective Date**"), the Plan was substantially consummated and became effective. *See* Docket No. 1152.

7. The Plan established the Litigation Trust for the purpose of, among other things, (i) investigating, commencing, litigating and settling certain causes of action that vested in the Litigation Trust pursuant to the Plan, and (ii) making distributions to the beneficiaries of the Litigation Trust, which are holders of Allowed Non-RSA GUC Claims against the Debtors. See Plan Art. 5.8.

8. Additional information regarding the Debtors' business, capital structure, and the circumstances leading to the commencement of their chapter 11 cases is set forth in the *Declaration of Mark Kent in Support of Debtors' Chapter 11 Petitions* [Docket No. 14] (the "**Kent Declaration**") and the *Declaration of Clayton Gring in Support of the Debtors' First Day Relief* [Docket No. 15] (the "**Gring Declaration**" and, together with the Kent Declaration, the "**First Day Declarations**"), each filed on February 5, 2024.

9. On May 30, 2024, the Court entered the *Order Extending Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [Docket No. 894] (the "**First Removal Extension Order**"). The First Removal Extension Order extended the Removal Deadline initially established by Bankruptcy Rule 9027 through and including September 3, 2024.

10. On September 19, 2024, the Court Entered the *Second Order Extending Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [Docket No. 1475] (the "**Second Removal Extension Order**"). The Second Removal Extension Order extended the Removal Deadline through and including January 2, 2025.

11. On January 27, 2025, the Court Entered the *Third Order Extending Period Within Which Reorganized Debtors and Litigation Trust May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [Docket No. 1536] (the "**Third Removal Extension Order**"). The Third Removal Extension Order extended the Removal Deadline through and including May 2, 2025.

12. On May 20, 2025, the Court Entered the *Fourth Order Extending Period Within Which Reorganized Debtors and Litigation Trust May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [Docket No. 1574] (the "**Fourth Removal Extension Order**"). The Fourth Removal Extension Order extended the Removal Deadline through and including September 2, 2025.

13. On September 29, 2025, the Court Entered the *Fifth Order Extending Period Within Which Reorganized Debtors and Litigation Trust May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [Docket No. 1603] (the "**Sixth Removal Extension Order**"). The Sixth Removal Extension Order extended the Removal Deadline through and including December 31, 2025.

14. On January 13, 2026, the Court Entered the Sixth Removal Extension Order. The Sixth Removal Extension Order extended the Removal Deadline through and including April 30, 2026.

## Jurisdiction

15. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

16. Pursuant to Local Rule 9013-1(f), the Reorganized Debtors consent to entry of a final order by the Court in connection with this Motion to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

**Relief Requested Should Be Granted**

17. Bankruptcy Rule 9027 and 28 U.S.C. § 1452 govern the removal of pending civil actions to the extent federal district courts have jurisdiction over such actions under 28 U.S.C. § 1334. Specifically, section 1452(a) provides in pertinent part as follows:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

18. Bankruptcy Rule 9027 establishes the deadline for filing notices of removal of claims or causes of action. Bankruptcy Rule 9027(a)(2) provides in pertinent part as follows:

> If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced a notice of removal may be filed [in the bankruptcy court] only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

Fed. R Bankr. P. 9027(a)(2).

19. With respect to post-petition actions, Bankruptcy Rule 9027(a)(3) provides that a notice of removal may be filed:

> [O]nly within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth

> the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

20. Finally, Bankruptcy Rule 9006(b)(1) provides that the Court can extend unexpired time periods, including the removal periods in Bankruptcy Rule 9027, without notice, upon a showing of cause:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order….

Fed. R. Bankr. P. 9006(b)(1).

21. It is well settled that this Court is authorized to extend the removal periods provided under Bankruptcy Rule 9027. *See*, *e.g.*, *Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984) (stating that under Bankruptcy Rule 9006(b), "it is clear that the court may grant such an extension [of time to remove]"), *effectively overruled in part on other grounds*, *Things Remembered, Inc. v. Petrarca*, 516 U.S. 124 (1995); *see also Caperton v. A.T. Massey Coal Co.*, 251 B.R. 322, 325 (S.D. W. Va. 2000) (explaining that Bankruptcy Rule 9006(b) allows a court to enlarge the time period for removing actions under Bankruptcy Rule 9027); *In re World Fin. Servs. Ctr. Inc.*, 81 B.R. 33, 39 (Bankr. S.D. Cal. 1987) (finding that the court may enlarge the time period for filing removal notices under Bankruptcy Rule 9027(a) pursuant to Bankruptcy Rule 9006(b)).

22. Cause exists to extend the Removal Deadline from the current deadline of April 30, 2026, through and including August 28, 2026. Since the Effective Date of the Plan, the Reorganized Debtors have been working diligently to review and reconcile claims and address and reconcile outstanding matters related to the assumption, or assumption and assignment, of certain

executory contracts and unexpired leases pursuant to the Plan. Moreover, since its inception on the Effective Date, the Litigation Trust has been engaged in investigating, analyzing and deciding whether to pursue the claims and causes of action that vested in the Litigation Trust pursuant to the Plan.

23. Certain of the Debtors and Reorganized Debtors are parties to various civil lawsuits and proceedings, certain of which may have vested in the Litigation Trust. The Reorganized Debtors and the Litigation Trust, as applicable, are evaluating whether they may seek to remove certain of these actions. Given the Reorganized Debtors' and Litigation Trust's focus to date, they have not yet had a sufficient opportunity to fully analyze and determine which civil actions, if any, they may seek to remove. The Reorganized Debtors and Litigation Trust require a reasonable amount of additional time to complete their evaluation of whether removal is appropriate in any litigation matters.

24. Accordingly, the Reorganized Debtors seek an extension of the Removal Deadline under Bankruptcy Rule 9027(a) to protect their rights and those of the Litigation Trust to remove those civil actions for which they may determine that removal is appropriate. The extension sought will afford the Reorganized Debtors and the Litigation Trust additional time to determine whether to remove any pending civil action and will ensure that the Reorganized Debtors and Litigation Trust do not forfeit valuable rights under 28 U.S.C. § 1452. Critically, the rights of other parties to the relevant litigation will not be prejudiced by the extension because any party to an action that is removed may seek to have the litigation remanded to the state court pursuant to section 1452(b).[5]

[5] Section 1452(b) provides that "[t]he court to which [a] claim or cause of action is removed may remand such claim or cause of action on any equitable ground. An order entered under this subsection remanding a claim or cause of action, or a decision to not remand, is not reviewable by appeal or otherwise . . . ." 28 U.S.C. § 1452(b).

25. The Reorganized Debtors further request that the Proposed Order be entered without prejudice to (a) any position the Reorganized Debtors, the Litigation Trust, or their successors in interest may take regarding whether section 362 of the Bankruptcy Code applies to stay any pending civil action in which any Debtor or Reorganized Debtor is a party and (b) the rights of the Reorganized Debtors, the Litigation Trust, or their successors in interest to seek further extensions of the period during which such parties may remove civil actions pursuant to Bankruptcy Rule 9027.

26. For the reasons stated above, the Reorganized Debtors submit that cause exists to grant the relief requested herein, which relief is in the best interest of the Debtors' estates. Moreover, requests by debtors for extensions of the removal period have been routinely granted by courts in this district. *See*, *e.g.*, *In re Mobility Air, LLC*, No. 23-11112 (KBO) (Bankr. D. Del. Jan. 12, 2026) [Docket No. 250] (granting seventh 120-day removal extension, for a total of 840 days, without prejudice to the debtors' ability to seek further extensions); *In re BBGI US, Inc.*, No. 20-11785 (BLS) (Bankr. D. Del. April 10, 2026) [Docket No. 1782] (granting a sixteenth 120-day removal extension, for a total of approximately 1,900 days, without prejudice to the ability of the liquidation trust, as representative of the debtors' estates, to seek further extensions).

**Notice**

27. Notice of this Motion will be provided to the following parties: (a) the U.S. Trustee (Attn: Benjamin A. Hackman, Esq. (Benjamin.A.Hackman@usdoj.gov) and Jon Lipshie, Esq. (Jon.Lipshie@usdoj.gov)); (b) Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 (Attn: Kris Hansen (krishansen@paulhastings.com) and Erez Gilad (erezgilad@paulhastings.com)) and Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801 (Attn: Justin R. Alberto (JAlberto@coleschotz.com)), as counsel to the Litigation Trust; (c) any party entitled to notice pursuant to Bankruptcy Rule 2002, and (d) the

non-Debtor parties to all pending civil actions in which the Debtor or Reorganized Debtor is a party (collectively, the "**Notice Parties**"). The Reorganized Debtors respectfully submit that no further notice is required.

**No Previous Request**

28. No previous request for the relief sought herein has been made by the Reorganized Debtors to this or any other court.

[*Remainder of page intentionally left blank*]

WHEREFORE the Reorganized Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: April 29, 2026
Wilmington, Delaware

*/s/ James F. McCauley*

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

| | | |
|---|---|---|
| **In re** | : | **Chapter 11** |
| | : | **Case No. 24–10164 (KBO)** |
| **CANO HEALTH, INC.,** | : | **Obj Deadline: May 13, 2026 at 4:00 p.m. (ET)** |
| **Reorganized Debtor.**[1] | : | **Hearing Date: May 29, 2026 at 11:00 a.m. (ET)** |

## NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on April 29, 2026, Cano Health, Inc. (together with the Closed Case Debtors, the "**Reorganized Debtors**," and prior to the Effective Date (as defined below), the "**Debtors**"), as the Reorganized Debtor in the above-captioned chapter 11 case, filed the *Motion of Reorganized Debtors for Entry of Seventh Order Extending Period Within Which the Reorganized Debtors and Litigation Trust May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bank. P. 9027 and Granting Related Relief* (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **May 13, 2026 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Karen B. Owens, United States Bankruptcy Judge for the District of Delaware, at the Court, 824

[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.

North Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801 on **May 29, 2026 at 11:00 a.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

[*Remainder of page intentionally left blank.*]

Dated: April 29, 2026
Wilmington, Delaware

*/s/ James F. McCauley*

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**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 Debtor.**[1] | : | **Re: Docket No. ____** |

**SEVENTH ORDER EXTENDING PERIOD WITHIN WHICH REORGANIZED DEBTORS AND LITIGATION TRUST MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND FED. R. BANKR. P. 9027 AND GRANTING RELATED RELIEF**

Upon the motion (the "**Motion**")[2] of Cano Health, Inc. (together with the Closed Case Debtors, the "**Reorganized Debtors**," and prior to the Effective Date, the "**Debtors**"), as Reorganized Debtor in the above-captioned chapter 11 case, pursuant to 28 U.S.C. § 1452 and Rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), for entry of an order extending the time by which the Reorganized Debtors and Litigation Trust may file notices of removal under Bankruptcy Rule 9027 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

[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] Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the 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 the Court 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 time period provided under Bankruptcy Rules 9027(a)(2) and 9027(a)(3) within which the Reorganized Debtors and the Litigation Trust may file notices of removal of any and all civil actions is extended through and including August 28, 2026, to the extent that the time period for filing any such notices of removal expires on or before that date.

3. This Order shall be without prejudice to (a) any position the Reorganized Debtors, the Litigation Trust, or their successors in interest may take regarding whether section 362 of the Bankruptcy Code applies to stay any pending civil action in which any Debtor or Reorganized Debtor is a party and (b) the rights of the Reorganized Debtors, the Litigation Trust, or their successors in interest to seek from this Court further extensions of the period within which the Reorganized Debtors and Litigation Trust may file notices of removal under Bankruptcy Rule 9027(a).

4. The Reorganized Debtors are authorized to take all reasonable actions necessary or appropriate to implement the relief granted in this Order.

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