IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	:	**Chapter 11**
CANO HEALTH, INC.,	:	**Case No. 24–10164 (KBO)**
Debtor.[1]	:	**Obj Deadline: July 6, 2026 at 4:00 p.m. (ET)** **Hearing Date: August 13, 2026 at 9:30 a.m. (ET)**

MOTION OF REORGANIZED DEBTORS FOR ENTRY OF ORDER (I) EXTENDING THE CLAIMS OBJECTION DEADLINE AND (II) 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**"), the Reorganized Debtors request entry of an order (i) extending the Claims Objection Deadline[2] by 180 days, from June 22, 2026,[3] through and including December 21, 2026, without prejudice to the ability of the Reorganized Debtors to request further extensions and (ii) granting related relief.

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

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[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 use but not defined herein have the meanings ascribed to them in the Plan (as defined below).

[3] Pursuant to Rule 9006-2 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Bankruptcy Rules**"), the filing of this Motion prior to the expiration of the current claims objection deadline extends such deadline until such time as the Court rules on the Motion. *See* Del. Bankr. L.R. 9006-2

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Background

3. Beginning on February 4, 2024 (the "**Petition Date**"), the Debtors each commenced with the Court a voluntary case under chapter 11 of title 11 of the United States Code (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 Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") 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 same day (the "**Effective Date**"), the Plan was substantially consummated and became effective. *See* Docket No. 1152 (the "**Effective Date Notice**").

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

[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.

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 these 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.

The Proof of Claim and the Claims Objection Deadline

9. On February 6, 2024, the Court entered an order authorizing the Debtors to retain Kurtzman Carson Consultants LLC ("**KCC**") as claims and noticing agent (the "**Claims Agent**") in these chapter 11 cases [Docket No. 79].[5] The Claims Agent is authorized and directed to, among other things, (i) perform noticing services and to receive, maintain, record and otherwise administer the proofs of claim (each, a "**Proof of Claim**") filed in these chapter 11 cases, (ii) serve as the custodian of court records, (iii) serve as the authorized repository for all Proofs of Claim, and (iv) maintain an official claims register for the Debtors (the "**Claims Register**").

10. On March 5, 2024, the Court entered the *Order (I) Establishing a General Bar Date to File Proofs of Claim, (II) Establishing a Bar Date to File Proofs of Claim by Governmental Units, (III) Establishing a Rejection Damages Bar Date, (IV) Establishing an Amended Schedules Bar Date, (V) Approving the Form and Manner for Filing Proofs of Claim, (VI) Approving the Proposed Notices of Bar Dates, (VII) Approving Procedures With Respect to*

[5] On June 11, 2024, KCC changed its name to KCC dba Verita Global ("**Verita**"). There has not been any change in the company's ownership structure.

Service of the Proposed Notice of Bar Dates, and (VIII) Granting Related Relief [Docket No. 259] (the "**Original Bar Date Order**" and, as corrected by the order dated April 16, 2024 [Docket No. 555] (the "**Corrected Bar Date Order**"), the "**Bar Date Order**").[6]

11. The Bar Date Order, among other things, established (i) April 22, 2024 at 5:00 p.m. (Prevailing Eastern Time) as the bar date by which all creditors, except for certain creditors falling within one of the exceptions set forth therein, were required to file Proofs of Claim, including for claims under section 503(b)(9) of the Bankruptcy Code, in the chapter 11 cases of each of the Debtors (the "**General Bar Date**"), and (ii) August 2, 2024 at 5:00 p.m. (Prevailing Eastern Time) as the deadline for all governmental units to file Proofs of Claim in the chapter 11 cases of each of the Debtors (the "**Governmental Bar Date**"). Moreover, the Confirmation Order and the Effective Date Notice established July 29, 2024 as the deadline to file claims based on the rejection of an executory contract or unexpired lease pursuant to the Plan (the "**Plan Rejection Damages Bar Date**," and together with the General Bar Dae, the Governmental Bar Date, and all other deadlines for filing or asserting claims in the Debtors' chapter 11 cases, the "**Bar Dates**").

12. The Debtors filed their schedules of assets and liabilities and statements of financial affairs by March 8, 2024 (collectively and as may be modified, amended, or

[6] As set forth in the Certification of Counsel filed on April 3, 2024 [Docket No. 555], following entry of the Original Bar Date Order and service and publication of the Bar Date Notice (as defined below), the Debtors identified a ministerial error in the Original Bar Date Order. Specifically, the Original Bar Date Order inadvertently excused any former officer, director, or employee of any of the Debtors from having to file a proof of claim for any claim based on indemnification, contribution, or reimbursement. To address any potential confusion caused by the discrepancy in the Original Bar Date Order, the Corrected Bar Date Order (i) required the Debtors to serve the Corrected Bar Date Order on all former officers, directors or employees of the Debtors within three (3) business days of entry of the Corrected Bar Date Order and (ii) extended the applicable Bar Date (as defined in the Corrected Bar Date Order) solely for such parties from April 22, 2024 to 5:00 p.m., prevailing Eastern Time on May 9, 2024 (the "**Extended Bar Date**"). Thereafter the Claims Agent served the Corrected Bar Date Order consistent with these requirements. *See* Cert. of Service, dated April 10, 2024 [Docket No. 624].

supplemented from time to time, the "**Schedules**"). *See* Docket Nos. 275-280, 282-289, 292-294, 296, 298-300, 302-304, 307-322, 324-327, 329-353, 355-389, 391-440, 450.

13. Pursuant to the Plan, the Debtors and Reorganized Debtors are entitled to object to claims. *See* Plan § 7.1. The Plan further provides that the Litigation Trust has standing with respect to the reconciliation of Non-RSA GUC Claims, including the right to object to Non-RSA GUC Claims. Plan § 5.8(g).

14. As of the date of this Motion, over 800 Proofs of Claim have been filed in the Debtors' chapter 11 cases. The process of reviewing and reconciling the Proofs of Claim and comparing them to the Debtors' books and records and the Schedules remains ongoing. As of the date hereof, the Debtors and Reorganized Debtors have filed four omnibus objections [Docket Nos. 981, 1082, 1523 and 1647] (the "**Omnibus Objections**") and three notices of satisfaction [Docket Nos. 990, 1524 and 1648] (the "**Notices of Satisfaction**"). Collectively, the Omnibus Objections and Notices of Satisfaction resolved over 300 claims (including claims in the Schedules and filed Proofs of Claim) totaling over $350 million. Moreover, the Reorganized Debtors are continuing to reconcile all remaining claims, including contingent, unliquidated, and disputed claims. The Reorganized Debtors and their professionals are working cooperatively to resolve any Proofs of Claim that have not yet been reconciled as expeditiously as possible.

15. Pursuant to the Plan, the Claims Objection Deadline means "the later of (a) one-hundred and eighty (180) days after the Effective Date, and (b) such later date as may be fixed by the Bankruptcy Court (in each case, as the same may be extended by an order of the Bankruptcy Court)." As set forth above, the Effective Date of the Plan occurred on June 28, 2024. Accordingly, the initial claims objection deadline was December 26, 2024.

16. On January 13, 2025, the Court entered the *Order (I) Extending the Claims Objection Deadline and (II) Granting Related Relief* [Docket No. 1531], extending the claims objection deadline through and including June 24, 2025.

17. On July 11, 2025, the Court entered the *Order (I) Extending the Claims Objection Deadline and (II) Granting Related Relief* [Docket No. 1586], extending the claims objection deadline through and including December 22, 2025.

18. On January 13, 2026, the Court entered the *Order (I) Extending the Claims Objection Deadline and (II) Granting Related Relief* [Docket No. 1635], extending the claims objection deadline through and including June 22, 2026.

Jurisdiction

19. 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.

20. Pursuant to Local Bankruptcy 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

21. The Plan authorizes this Court to enter an order extending the Claims Objection Deadline. *See* Plan § 1.21. Bankruptcy Rule 9006(b)(1) also provides that:

> when an act is required or allowed to be done at or within a specified period . . . by order of the 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 thereof is made before the expiration of the period originally prescribed . . .

Fed. Bankr. P. 9006(b)(1). This request is being made before the expiration of the Claims Objection Deadline and therefore Bankruptcy Rule 9006(b)(1) permits extension of such deadline.

22. Further, section 105(a) of the Bankruptcy Code empowers the Bankruptcy Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title," 11 U.S.C. § 105, and it is generally recognized that section 105(a) "authorizes the bankruptcy court . . . to fashion such orders as are required to further the substantive provisions of the [Bankruptcy] Code.". *See* 11 U.S.C. § 105(a); *Thomas v. City of Phila.*, 759 F. App'x. 110, 111 (3d Cir. 2019) (quoting *In re Morristown v. Erie R.R. Co.*, 885 F.2d 98, 100 (3d Cir. 1999)).

23. Here, good and sufficient cause exists to extend the Claims Objection Deadline. The Reorganized Debtors, with the assistance of their advisors, have worked diligently to review and reconcile the Proofs of Claim with the Schedules and the Debtors' books and records. In addition, the Reorganized Debtors have engaged in significant efforts to resolve claims that have been filed or informally asserted since the Effective Date. Through these efforts, and by, among other things, the Omnibus Objections and the Notices of Satisfaction, the Reorganized Debtors have objected to, settled, or otherwise resolved over 300 claims totaling over $350 million. The Reorganized Debtors have also reconciled many other claims informally without the need for Court filings. Moreover, the Reorganized Debtors will continue to engage in negotiations regarding certain claims. The potential value these negotiations could bring to the Debtors' estates would be lost if the Claims Objection Deadline is not extended.

24. The Reorganized Debtors continue to diligently reconcile claims and expect that the majority of the remaining claims will be reconciled, settled or otherwise consensually

resolved in the near future. While the Reorganized Debtors have made significant progress to date, including by filing the Omnibus Objections and the Notices of Satisfaction, the Reorganized Debtors require additional time to address outstanding claims and to object, reconcile, settle or otherwise resolve them without the need for protracted claims litigation. Indeed, the Reorganized Debtors submit that it would be a waste of resources to prematurely file objections to certain claims at this stage.

25. Accordingly, the requested extension of 180 days is reasonable and will provide additional time for the Reorganized Debtors to pursue consensual resolutions of any disputed claims and/or to file objections where such resolutions cannot be reached.

Notice

26. 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; and (c) any party entitled to notice pursuant to Bankruptcy Rule 2002 (collectively, the "**Notice Parties**"). The Reorganized Debtors respectfully submit that no further notice is required.

No Previous Request

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

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: June 22, 2026
Wilmington, Delaware

/s/ Amanda R. Steele

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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: July 6, 2026 at 4:00 p.m. (ET)**
Debtor.[1]	:	**Hearing Date: August 13, 2026 at 9:30 a.m. (ET)**

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on June 22, 2026, 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* (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 **July 6, 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 North Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801 on **August 13, 2026 at 9:30 a.m. (prevailing Eastern Time)**.

[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.

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.

Dated: June 22, 2026
Wilmington, Delaware

/s/ Amanda R. Steele

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

ORDER (I) EXTENDING THE CLAIMS OBJECTION DEADLINE AND (II) 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 (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

[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.

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 December 21, 2026.

3. This Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline.

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.