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]	:	**Hearing Date: September 10, 2026 at 9:30 a.m. (ET)** **Response Deadline: August 7, 2026 at 4:00 p.m. (ET)**

REORGANIZED DEBTORS' FIFTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIMS, AND LOCATE THEIR NAMES AND CLAIMS ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER APPENDED TO THIS OBJECTION.

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 objection (this "**Objection**"), pursuant to section 502 of title 11 of the United States Code (the "**Bankruptcy Code**"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "**Local Bankruptcy Rules**"), the Reorganized

[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.

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Debtors request entry of an order: (i) disallowing and expunging the amended and superseded claims identified on **Schedule 1** attached to the Proposed Order (the "**Amended and Superseded Claims**"), and (ii) disallowing and expunging the duplicate proofs of claim identified on **Schedule 2** attached to the Proposed Order (the "**Duplicate Claims**," and together with the Amended and Superseded Claims, the "**Disputed Claims**").

2. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A**.

3. In support of this Objection, the Reorganized Debtors submit the *Declaration of John Lines in Support of Reorganized Debtors' Fifth Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims* (the "**Lines Declaration**"), annexed hereto as **Exhibit B**.

Jurisdiction and Venue

4. 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.

5. 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 Objection 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.

Background

A. General Background

6. 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.

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

8. 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**").[2]

9. 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] and the *Declaration of Clayton Gring in Support of the Debtors' First Day Relief* [Docket No. 15], each filed on February 5, 2024.

10. 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.

[2] Pursuant to section 12.3 of the Plan (as defined herein), except for certain limited purposes including to prosecute fee applications, the Creditors' Committee dissolved on the Effective Date (as defined herein). *See* Plan § 12.3.

See Docket No. 1152. Pursuant to the Plan, the Reorganized Debtors are responsible for the Claims Reconciliation Process (as defined in the Plan).

B. Specific Background

11. 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 their chapter 11 cases [Docket No. 79].[3] 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 the Debtors' 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**").

12. 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 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**").[4] The Bar Date Order, among

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[3] 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.

[4] 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

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**" and, together with the Extended Bar Date, the General Bar Date, and the other deadlines for filing Proofs of Claim established by the Bar Date Order, the "**Bar Dates**").

13. On March 8, 2024, the Debtors filed the *Notice of Deadlines to File Proofs of Claim* [Docket No. 446] (the "**Bar Date Notice**"). Thereafter, the Claims Agent served the Bar Date Notice consistent with the requirements of the Original Bar Date Order. *See* Docket Nos. 475, 523, 623, 656, 674, 687, 767, 799, 800, 855, and 896. In addition, the Claims Agent published the Bar Date Notice in *The Wall Street Journal,* the *Miami Herald*, and the *Sun Sentinel*. *See* Docket No. 469.

14. 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 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.

15. In the ordinary course, the Debtors and Reorganized Debtors maintain books and records (the "**Books and Records**") that reflect, among other things, the Debtors' aggregate liabilities and the specific amounts owed to each of their creditors. The Reorganized

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].

Debtors and their advisors are reviewing and continuing to reconcile all claims, including both claims identified on the Schedules (the "**Scheduled Claims**") and the Proofs of Claim. While this analysis and reconciliation is ongoing, the Reorganized Debtors have determined the Disputed Claims should be disallowed for one or more reasons. Accordingly, the Reorganized Debtors file this Objection seeking the relief requested above.

Basis for Relief Requested

16. Section 502(a) of the Bankruptcy Code provides that a filed proof of claim is "deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). When asserting a proof of claim against a bankruptcy estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See Id. at* 173–74. A party wishing to dispute a claim's validity must produce evidence sufficient to negate the claim's *prima facie* validity. *Id.* at 173–74. In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim's legal sufficiency. *Id*. Once an objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* at 174. Ultimately, the burden of persuasion is on the claimant. *Id.* Section 502(b)(1) of the Bankruptcy Code further provides, in relevant part, that a claim may not be allowed if "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured." 11 U.S.C. § 502(b)(1).

A. Amended and Superseded Claims

17. As set forth in the Lines Declaration, based on review and analysis, the Reorganized Debtors have determined that each Amended and Superseded Claim listed under the

column labeled "Amended Claim to be Disallowed" has been amended and superseded by a subsequently filed Proof of Claim by the same claimant and on account of the same liability as that listed in the column labeled "Remaining Claim" (the "**Remaining Claims**").

18. The relief requested is necessary to prevent the allowance of the Amended and Superseded Claims, which by their nature have been superseded and remain on the Claims Register only as a technicality. The Reorganized Debtors should not be required to pay twice on the same obligation. Disallowance of the Amended and Superseded Claims will enable the Claims Register to reflect more accurately the claims that were asserted against the Debtors. The claimants holding the Amended and Superseded Claims will not be prejudiced by having their Amended and Superseded Claims disallowed and expunged because the Remaining Claims will remain on the Claims Register, subject to the Reorganized Debtors' ongoing right to object to such claims on applicable grounds, including in any subsequent omnibus objections.

19. Therefore, the Reorganized Debtors (i) object to the Amended and Superseded Claims listed on **Schedule 1** to the Proposed Order, and (ii) request that the Amended and Superseded Claims listed under the column labeled "Amended Claim to be Disallowed" be disallowed and expunged in their entirety.

B. Duplicate Claims

20. As set forth in the Lines Declaration, based upon a careful review and analysis of the Books and Records, the Schedules, and the Claims Register, the Reorganized Debtors have determined that each Duplicate Claim was filed by or on behalf of the same claimant, in the same amount and priority, and on account of the same alleged liability more than once. The claims listed under the column labeled "Duplicate Claim to be Disallowed" are duplicative of the corresponding claims listed under the column labeled "Remaining Claim" (*i.e.*, the Remaining Claims).

21. The Reorganized Debtors should not be required to pay twice on the same obligation. Disallowance of redundant Duplicate Claims will enable the Claims Register to reflect more accurately the claims asserted against the Debtors. Any disallowance or expungement of the Duplicate Claims will not prejudice any claimants or their substantive rights against the Reorganized Debtors because each Remaining Claim will remain on the Claims Register, subject to parties' rights to object to such claim on any and all grounds, including in any subsequent omnibus objections.

22. Certain of the Duplicate Claims were asserted against different debtors (the "**Cross-Debtor Duplicate Claims**"). Local Rule 3007-1(c)(i) provides, in that "[a]n omnibus objection is deemed to be made on a substantive basis unless it is based on . . . [the claim being a] [d]uplicate claim, but a claim filed against two or more different debtors is not a duplicate claim unless the debtor's estates have been substantively consolidated." Del. Bankr. L.R. 3007-1(c)(i). While the Debtors' estates were not substantively consolidated under the Plan, the Plan provides that "[t]he Plan groups the Debtors together . . . for the purposes of . . . making distributions in accordance with the Plan . . . ." Moreover, the treatment for Non-RSA GUC Claims under the Plan contemplates such claims being paid out of a common pool of assets. *See* Plan Art. IV.4.5. Accordingly, for purposes of the Plan, claims asserted against different Debtors are duplicative and, the Debtor submits that objecting to such claims on a non-substantive basis is warranted.

23. Accordingly, to avoid the possibility of improper recoveries and to maintain an accurate Claims Register, the Reorganized Debtors (i) object to the Duplicate Claims listed on **Schedule 2** to the Proposed Order, and (ii) request that the Duplicate Claims listed under the column labeled "Duplicate Claim to be Disallowed" be disallowed and expunged in their entirety.

Responses to this Objection

24. To contest this Objection, a claimant must file a written response to the Objection (a "**Response**") with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801, by no later than **August 7, 2026 at 4:00 p.m. (Prevailing Eastern Time)** (the "**Response Deadline**"). In addition, a claimant must serve its Response on the following entities in accordance with the Local Bankruptcy Rules: (a) counsel to the Reorganized Debtors, (i) Weil, Gotshal & Manges LLP, Attn: Gary T. Holtzer, Jessica Liou, Matthew P. Goren, and Kevin Bostel (gary.holtzer@weil.com, jessica.liou@weil.com, matthew.goren@weil.com, and kevin.bostel@weil.com), and (ii) Richards, Layton & Finger, P.A., Attn: Michael J. Merchant, Amanda R. Steele, and James F. McCauley (merchant@rlf.com, steele@rlf.com and mccauley@rlf.com); (b) counsel to the Litigation Trust (as defined in the Plan), (i) Paul Hastings LLP, 200 Park Avenue, New York, NY 10166, Attn: Kristopher M. Hansen and Erez Gilad (krishansen@paulhastings.com and erezgilad@paulhastings.com), and (ii) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801, Attn: Justin R. Alberto and Jack M. Dougherty (JAlberto@coleschotz.com and jdougherty@coleschotz.com); and (c) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801, Attn: Benjamin A. Hackman, Esq. (Benjamin.A.Hackman@usdoj.gov) and Jon Lipshie, Esq. (Jon.Lipshie@usdoj.gov).

25. Claimants should locate their names and Disputed Claims on **Schedules 1** and **2** to the Proposed Order and carefully review this Objection. A Response must address each ground on which the Reorganized Debtors object to a particular Disputed Claim.

26. Every Response must contain, at a minimum, the following information:

i. a caption setting forth the name of the Court that includes the Reorganized Debtor's case number, and the title of the Objection to which the Response is directed;

ii. the name of the claimant, the claim number, and a description of the basis for the amount of the claim;

iii. the specific factual basis and supporting legal argument on which the party will rely in opposing this Objection;

iv. all documentation and other evidence in support of the claim, not previously filed with the Court or the claims and noticing agent, on which the claimant will rely in opposing this Objection; and

v. the name, address, telephone number, fax number, and/or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Reorganized Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the claim on behalf of the claimant.

27. If a Response is properly and timely filed and served in accordance with the above procedures, the Reorganized Debtors will endeavor to reach a consensual resolution with the claimant. If no consensual resolution is reached, the Court will conduct a hearing with respect to the Objection and the Response on **September 10, 2026 at 9:30 a.m. (Prevailing Eastern Time)**, or such other date and time as parties filing Responses may be notified. Only those Responses made in writing and timely filed will be considered by the Court at any such hearing.

28. The Reorganized Debtors reserve the right to seek an adjournment of the hearing on any Response to this Objection, which adjournment will be noted on the notice of agenda for the hearing. The agenda will be served on the person designated by the claimant in its Response.

29. If a claimant fails to timely file a Response by the Response Deadline, the Reorganized Debtors may present to the Court an appropriate order disallowing and expunging the

Disputed Claims as set forth in **Schedules 1** and **2** to the Proposed Order, without further notice to the claimant or a hearing.

30. The Objection by the Reorganized Debtors to each claim shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each claim subject thereto.

Reservation of Rights

31. The Reorganized Debtors expressly reserve the right to amend, modify, or supplement this Objection and to file objections to any other claims (filed or not) that have been or may be asserted against the Debtors' estates. Should one or more of the grounds of objection stated in this Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Disputed Claims or any other Proofs of Claim on any other grounds that the Reorganized Debtors discover or elect to pursue.

32. Notwithstanding anything contained in this Objection, or the exhibits and schedules attached hereto, nothing herein will be construed as a waiver of any rights that the Reorganized Debtors, or any successor to the Reorganized Debtors, may have to enforce rights of setoff against the claimants.

33. Nothing in this Objection shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of

any of the Reorganized Debtors' claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

Compliance with Local Bankruptcy Rule 3007-1

34. To the best of the Reorganized Debtors' knowledge and belief, this Objection substantially complies with Local Bankruptcy Rule 3007-1. To the extent this Objection does not comply in all respects with the requirements of Local Bankruptcy Rule 3007-1 (including, without limitation, by including objections to the Cross-Debtor Duplicate Claims), the undersigned believes such deviations are not material and respectfully requests that any such requirement be waived.

Notice

35. Notice of this Objection will be provided to the following parties: (a) the Office of the United States Trustee for the District of Delaware (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 and Jack M. Dougherty (JAlberto@coleschotz.com and jdougherty@coleschotz.com)), as counsel to the Litigation Trust; (c) any party that has requested notice pursuant to Bankruptcy Rule 2002; and (d) the claimants whose claims are subject to this Objection (collectively, the "**Notice Parties**").

36. The Reorganized Debtors respectfully submit that no further notice is required.

No Previous Request

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

THEREFORE 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: July 17, 2026
Wilmington, Delaware

/s/ James F. McCauley

RICHARDS, LAYTON & FINGER, P.A.
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-and-

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Attorneys for the Reorganized Debtors

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM.

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]	:	**Hearing Date: September 10, 2026 at 9:30 a.m. (ET)**
		Response Deadline: August 7, 2026 at 4:00 p.m. (ET)

NOTICE OF OMNIBUS OBJECTION AND HEARING

PLEASE TAKE NOTICE that, on July 17, 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 *Reorganized Debtors' Fifth Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims* (the "**Objection**")[2] with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). **Your claim(s) may be disallowed and/or expunged as a result of the Objection. Therefore, you should read the attached Objection carefully.**

PLEASE TAKE FURTHER NOTICE THAT YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION AND BY ANY FURTHER CLAIM OBJECTION THAT MAY BE FILED BY THE REORGANIZED DEBTORS OR OTHERWISE. THE RELIEF SOUGHT

[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 Objection.

IN THE OBJECTION IS WITHOUT PREJUDICE TO THE REORGANIZED DEBTORS' RIGHT TO PURSUE FURTHER OBJECTIONS AGAINST YOUR CLAIM(S) SUBJECT TO THE OBJECTION IN ACCORDANCE WITH APPLICABLE LAW AND APPLICABLE ORDERS OF THE COURT.

PLEASE TAKE FURTHER NOTICE that if the holder of a claim that is the subject of the Objection wishes to respond to the Objection, the holder must file a written response (each a "**Response**") with: (a) the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, (b) counsel to the Reorganized Debtors, (i) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Gary T. Holtzer, Esq., Jessica Liou, Esq., Matthew P. Goren, Esq., and Kevin Bostel (emails: gary.holtzer@weil.com, jessica.liou@weil.com, matthew.goren@weil.com, and kevin.bostel@weil.com) and (ii) Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801, Attn: Michael J. Merchant, Esq., Amanda R. Steele, Esq., and James F. McCauley, Esq. (emails: merchant@rlf.com, steele@rlf.com and mccauley@rlf.com); (c) counsel to the Litigation Trust (as defined in the Plan), (i) Paul Hastings LLP, 200 Park Avenue, New York, NY 10166, Attn: Kristopher M. Hansen and Erez Gilad (krishansen@paulhastings.com and erezgilad@paulhastings.com), and (ii) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801, Attn: Justin R. Alberto and Jack M. Dougherty (JAlberto@coleschotz.com and jdougherty@coleschotz.com); and (d) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801, Attn: Benjamin A. Hackman, Esq. (Benjamin.A.Hackman@usdoj.gov) and Jon Lipshie, Esq. (Jon.Lipshie@usdoj.gov). on or before **August 7, 2026 at 4:00 p.m. (prevailing Eastern Time)** (the "**Response Deadline**").

PLEASE TAKE FURTHER NOTICE that Responses to the Objection must contain, at minimum, the following: (a) a caption setting forth the name of the Court, the name of the Reorganized Debtors, the case number, and the title of the Objection to which the Response is directed; (b) the name of the claimant, the claim number, and a description of the basis for the amount of the claim; (c) the specific factual basis and supporting legal argument upon which the party will rely in opposing the Objection; (d) all documentation and other evidence in support of the claim, not previously filed with the Court or the claims and noticing agent, on which the claimant will rely in opposing the Objection; and (e) the name, address, telephone number, fax number and/or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Reorganized Debtors should communicate with respect to the Claim subject to the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the Claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE that if no Response to the Objection is timely filed and received in accordance with the above procedures, an order may be entered sustaining the Objection without further notice or a hearing. If a Response is properly filed, served and received in accordance with the above procedures and such Response is not resolved, a hearing to consider such Response and the Objection will be held 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 **September 10, 2026 at 9:30 a.m. (prevailing Eastern Time)** (the "**Hearing**"). Only a Response made in writing and timely filed will be considered by the Court at the Hearing.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY SUSTAIN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 17, 2026
Wilmington, Delaware

/s/ James F. McCauley

RICHARDS, LAYTON & FINGER, P.A.
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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 Debtor.[1]	:	**Re: Docket No. __**

ORDER SUSTAINING REORGANIZED DEBTORS' FIFTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS

Upon the *Reorganized Debtors' Fifth Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims* (the "**Objection**"),[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**"), for entry of an order (i) disallowing and expunging the amended and superseded claims identified on **Schedule 1** attached hereto (the "**Amended and Superseded Claims**"), and (ii) disallowing and expunging the duplicate proofs of claim identified on **Schedule 2** attached hereto (the "**Duplicate Claims**," and together with the Amended and Superseded Claims, the "**Disputed Claims**") all as more fully described in the Objection; and the Court having reviewed the Objection and having considered the statements of counsel with respect to the Objection at a hearing (if any) before the Court; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C.

[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 have the respective meanings ascribed to such terms in the Objection.

§§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this 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 the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection has been given and that no other or further notice is necessary; and upon the Lines Declaration; and upon the record of all proceedings before the Court; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this order, **IT IS HEREBY ORDERED THAT**

1. The Objection is granted to the extent set forth herein.

2. Any Response to the Objection not otherwise withdrawn, resolved, or adjourned is overruled on the merits.

3. The Amended and Superseded Claims listed in the column labeled "Amended Claim to be Disallowed" on **Schedule 1** hereto are disallowed and expunged in their entirety. The Remaining Claims listed in the column labeled "Remaining Claim" identified on **Schedule 1** hereto shall remain on the Claims Register, without prejudice to any party's rights to object to such claims on any and all grounds.

4. The Duplicate Claims listed in the column labeled "Duplicate Claim to be Disallowed" on **Schedule 2** hereto are disallowed and expunged in their entirety. The Remaining Claims listed in the column labeled "Remaining Claim" identified on **Schedule 2** hereto shall remain on the Claims Register, without prejudice to any party's rights to object to such claims on any and all grounds.

5. The Objection by the Reorganized Debtors to the Disputed Claims, as addressed in the Objection and the schedules hereto, constitutes a separate contested matter with respect to each such claim, as contemplated by Bankruptcy Rule 9014 and Local Bankruptcy Rule 3007-1. This Order shall be deemed a separate Order with respect to each Disputed Claim.

6. Any stay of this Order pending appeal by any holder of a Disputed Claim or any other party with an interest in the Disputed Claims subject to this Order shall only apply to the contested matter which involves such party and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters arising from the Objection or this Order.

7. The Reorganized Debtors, the Debtors' claims and noticing agent, Verita,[3] and the Clerk of this Court are authorized to modify the official Claims Register for these chapter 11 cases in compliance with the terms of this Order, and to take all steps necessary or appropriate to carry out the relief granted in this Order.

8. Nothing in the Objection or this Order, nor any actions by the Reorganized Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Reorganized Debtors, the Debtors', or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any of the

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

Debtors' or Reorganized Debtors claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable.

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

Schedule 1

Amended and Superseded Claims

Claimant Name	Amended Claim to be Disallowed				Remaining Claim				Reason
	Date Filed	Claim No.	Debtor	Amount	Date Filed	Claim No.	Debtor	Amount	
Brevard County Tax Collector	3/7/2024	74	Cano Health, LLC	(S) $538.41 (A) $0.00 (P) $0.00 (U) $0.00 (T) $538.41	10/16/2024	812	Cano Health, Inc.	(S) $1,120.71 (A) $0.00 (P) $0.00 (U) $0.00 (T) $1,120.71	Claim No. 74 was amended and superseded by Claim No. 812.
City of Houston	3/4/2024	61	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	01/06/2025	831	Cano Health, Inc.	(S) $227.18 (A) $0.00 (P) $0.00 (U) $0.00 (T) $227.18	Claim No. 61 was amended and superseded by Claim No. 831.
Hewlett-Packard Financial Services Company	3/27/2024	277	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $442,733.33 (T) $0.00	7/25/2024	793	Cano Health, Inc.	(S) $64,500.16 (A) $0.00 (P) $0.00 (U) $442,773.33 (T) $507,273.49	Claim No. 277 was amended and superseded by Claim No. 793.
Houston Comm Coll System	3/4/2024	63	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	1/6/2025	833	Cano Health, Inc.	(S) $42.09 (A) $0.00 (P) $0.00 (U) $0.00 (T) $42.09	Claim No. 63 was amended and superseded by Claim No. 833.
Houston ISD	3/4/2024	60	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	1/6/2025	832	Cano Health, Inc.	(S) $379.94 (A) $0.00 (P) $0.00 (U) $0.00 (T) $379.94	Claim No. 60 was amended and superseded by Claim No. 832.

(S) = Secured
(A) = Administrative Expense/503(b)(9)
(P) = Priority Unsecured
(U) = General Unsecured
(T) = Total

Claimant Name	Amended Claim to be Disallowed				Remaining Claim				Reason
	Date Filed	Claim No.	Debtor	Amount	Date Filed	Claim No.	Debtor	Amount	
Maria Hernandez	4/10/2024	362	Cano Health, LLC	(S) $22,565.68 (A) $500.00 (P) $34,025.00 (U) $2,909.32 (T) $60,000.00	9/6/2024	808	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $49,850.00 (U) $0.00 (T) $49,850.00	Claim No. 362 was amended and superseded by Claim No. 808.
NM Taxation & Revenue Department	05/15/2024	723	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $102.96 (U) $4.00 (T) $106.96	11/12/2024	827	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $52.96 (U) $4.00 (T) $56.96	Claim No. 723 was amended and superseded by Claim No. 827.

Schedule 2

Duplicate Claims

Claimant Name	Duplicate Claim to be Disallowed				Remaining Claim				Reason
	Date Filed	Claim No.	Debtor	Amount	Date Filed	Claim No.	Debtor	Amount	
Aguilar, Richard	5/8/2024	706	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	5/8/2024	707	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	Claim No. 707 is duplicative of Claim No. 706.
Central Medical Group, P.A.	3/18/2024	119	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $23,355.00 (T) $23,355.00	5/29/2024	753	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $23,355.00 (T) $23,355.00	Claim No. 119 is duplicative of Claim No. 753.
Conger, Jason	5/8/2024	709	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	5/8/2024	710	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	Claim No. 709 is duplicative of Claim No. 710.
Cordero, Pedro	5/08/2024	713	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	5/8/2024	711	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	Claim No. 713 is duplicative of Claim No. 711.
Corbin South, LLC	3/21/2024	234	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $453,383.70 (T) $453,383.70	3/21/2024	236	Cano Health CA1 MSO, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $453,383.70 (T) $453,383.70	Claim No. 234 is duplicative of Claim No. 236.
Dental Excellence Partners	4/19/2024	520	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00	4/18/2024	472	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00	Claim No. 520 is duplicative of Claim No. 472.

Claimant Name	Duplicate Claim to be Disallowed				Remaining Claim				Reason
	Date Filed	Claim No.	Debtor	Amount	Date Filed	Claim No.	Debtor	Amount	
				(U) $0.00 (T) $0.00				(U) $0.00 (T) $0.00	
Dorsett, Jeffrey	06/05/2024	758	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $150,000.00 (T) $150,000.00	09/19/2024	809	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $150,000.00 (T) $150,000.00	Claim No. 758 is duplicative of Claim No. 809.
Green, Frederick S.	4/19/2024	544	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	4/19/2024	545	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	Claim No. 544 is duplicative of Claim No. 545.
Hernandez, Marlow	5/8/2024	704	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	5/8/2024	705	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $0.00 (T) $0.00	Claim No. 704 is duplicative of Claim No. 705.
Laboratory Corporation of America Holdings	5/15/2024	725	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $107,211.96 (T) $107,211.96	5/15/2024	724	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $107,211.96 (T) $107,211.96	Claim No. 725 is duplicative of Claim No. 724.
MedCloud Depot, LLC	6/20/2024	776	Physicians Partners Group Puerto Rico, LLC (FL)	(S) $0.00 (A) $0.00 (P) $0.00 (U) $36,198.74 (T) $36,198.74	6/20/2024	775	Physicians Partners Group Puerto Rico, LLC (PR)	(S) $0.00 (A) $0.00 (P) $0.00 (U) $36,198.74 (T) $36,198.74	Claim No. 776 is duplicative of Claim No. 775.
Miami Dade Water and Sewer Department	8/2/2024	801	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $12,572.48 (T) $12,572.48	8/8/2024	803	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $12,572.48 (T) $12,572.48	Claim No. 801 is duplicative of Claim No. 803.

Exhibit B

Lines Declaration

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]	:	

DECLARATION OF JOHN LINES IN SUPPORT OF THE REORGANIZED DEBTORS' FIFTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS

I, John Lines, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I currently serve as the Chief Legal Officer of the Reorganized Debtors and have been employed by the Debtors since January 2024. I have been practicing law for over 20 years and have focused my practice on the healthcare industry for much of that time. Prior to joining the Debtors, I served as in-house counsel for a number of other healthcare companies.

2. I submit this declaration (the "**Declaration**") in support of the *Reorganized Debtors' Fifth Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims* (the "**Objection**").[2]

3. I am over the age of eighteen and am authorized by the Reorganized Debtors to submit this Declaration. Except as otherwise indicated, the facts and all statements in this Declaration are based on my personal knowledge, my review (or the review of others under my

[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 have the respective meanings ascribed to such terms in the Objection.

supervision) of the relevant Proofs of Claim and the documentation attached thereto, the official register of claims filed in the chapter 11 cases, information received by me from personnel and/or advisors of the Reorganized Debtors, my review of the Books and Records, and my experience and knowledge of the claims process in the Debtors' chapter 11 cases. If called as a witness, I could and would competently testify to the facts set forth in this Declaration.

4. The Proofs of Claim subject to the Objection were carefully reviewed and analyzed in good faith using due diligence by appropriate personnel of the Reorganized Debtors, those familiar with the Books and Records, and the Reorganized Debtors' professionals.

Amended and Superseded Claims

5. Based upon my review and analysis of the Amended and Superseded Claims listed on **Schedule 1** to the Proposed Order, I and my team have determined that the Amended and Superseded Claims listed under the column "Amended Claim to be Disallowed" have been amended and superseded by a subsequently-filed Proof of Claim by the same claimant and on account of the same liability.

6. Specifically, each Amended and Superseded Claim listed under the column "Amended Claim to be Disallowed" in the schedule has been amended and superseded by a subsequently filed Remaining Claim, and the Remaining Claim has identified that it amends and supersedes a previously filed Proof of Claim. In some instances, while the claimant identified on the face of the Remaining Claim that the claim was intended to amend another Proof of Claim, the corresponding amended claim was not identified by number by the claimant. In those instances, the Reorganized Debtors' professionals performed an in-depth review of the Claims Register to determine that the Remaining Claims amended and superseded the Amended and Superseded Claims. Therefore, after careful review by myself and members of my team, it is my belief that

each Amended and Superseded Claim listed under the column "Amended Claim to be Disallowed" was in fact amended and superseded by the corresponding Remaining Claim.

7. The relief requested is necessary to prevent the allowance of the Amended and Superseded Claims, which by their nature have been superseded and remain on the Claims Register only as a technicality. Disallowance of such claims will enable the Claims Register to reflect more accurately the claims asserted against the Debtors. The claimants holding the Amended and Superseded Claims will not be prejudiced by having their Amended and Superseded Claims disallowed and expunged because the Remaining Claims will survive on the Claims Register, subject to the Reorganized Debtors' ongoing right to object to the Remaining Claims on applicable grounds.

Duplicate Claims

8. Based upon my review and analysis of the Duplicate Claims listed on **Schedule 2** to the Proposed Order and the Claims Register, I and my team have determined that each Duplicate Claim was filed by or on behalf of the same claimant, in the same amount and priority, and on account of the same alleged liability, more than once. Each claim listed under the column "Duplicate Claim to be Disallowed" is duplicative of the corresponding claim listed under the column labeled "Remaining Claim."

9. The Reorganized Debtors' professionals performed an in-depth review of the Proofs of Claim and the Claims Register to determine whether the Duplicate Claims were in fact filed by, or on behalf of, the same claimant and on account of the same liability as the corresponding Remaining Claims. Moreover, this review included ensuring that the Remaining Claims include those that attached the most fulsome documentation. Therefore, after careful

review, it is my belief that all of the Duplicate Claims listed under the column "Duplicate Claim to be Disallowed" are in fact duplicates of the corresponding Remaining Claim.

10. Disallowance of these redundant claims will enable the Claims Register to reflect more accurately the claims asserted against the Debtors. Any disallowance or expungement of the Duplicate Claims will not prejudice any claimants or their substantive rights against the Debtors because each Remaining Claim will survive on the Claims Register, subject to the Reorganized Debtors' ongoing right to object to the Remaining Claims on applicable grounds.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: July 17, 2026

/s/John Lines
John Lines
Chief Legal Officer
Cano Health, Inc.