IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CANO HEALTH, INC.,	Case No. 24-10164 (KBO) (Jointly Administered)
Reorganized Debtor.[1]	**RE: D.I. 1675**

JOINT LIMITED OBJECTION AND RESERVATION OF RIGHTS OF MARLOW HERNANDEZ, JASON CONGER, RICHARD AGUILAR, PEDRO CORDERO AND DENTAL EXCELLENCE PARTNERS TO REORGANIZED DEBTOR'S FIFTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS

Respondents Movants Marlow Hernandez, Jason Conger, Richard Aguilar, Pedro Cordero, and Dental Excellence Partners (collectively, the "Claimants" or "Respondents"), by their undersigned counsel, file this Joint Limited Objection and Reservation of Rights (the "Reservation of Rights") to *Reorganized Debtor's Fifth Omnibus (Non-Substantive) Objection to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims* [Doc. No. 1675] (the "Claims Objection").[2]

Response

1. Each of the Claimants timely filed proofs of claims in unknown and unliquidated amounts against both Cano Health, LLC (the "Cano LLC Claims") and CHI (the "CHI Claims", and together with the Cano LLC Claims, the "Claims").

[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.'s (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, FL 33178.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Claims Objection.

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2. The Claims Objection asserts that its purpose is to prevent duplicative claims and any related double-recovery that could occur as a result of duplicative claims.

3. The Claims Objection seeks to disallow the Cano LLC Claims and to leave the CHI Claims as the Remaining Claim for each of the Claimants.

4. To the extent that the Cano LLC Claims are, in fact, exactly the same as the claims that were asserted in the CHI Claims, the Claimants do not dispute that they are not entitled to a "double recovery."

5. However, as the Claims are still unliquidated, it is unclear whether the claims are properly asserted against Cano Health, LLC or CHI and whether the asserted claims are, in fact, duplicative.

6. To the extent that the Claims Objection would impede the Claimants' ability to assert and collect on any Claim that is otherwise liquidated and determined to be valid against Cano Health, LLC but not CHI due to the disallowance of these "duplicative" claims, the Claimants object.

7. Claimants reserve all rights to seek allowance of such Cano LLC Claims to the extent (i) necessary to receive a distribution to which they are entitled and (ii) that the allowance of such claim would not result in a duplicative claim and relatedly disproportionate distribution to the Claimants.

WHEREFORE, Respondents respectfully request that this Court (i) deny the relief requested in the Claims Objection in its current form, (ii) sustain the Claimants' objection to the Claims Objection and preserve the Claimant's rights pertaining to the Duplicate Claims, as set forth herein, and (iii) grant such other and further relief as is just and proper.

Dated: August 7, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Thomas J. Francella, Jr.

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Attorneys for Claimants

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CERTIFICATE OF SERVICE

I, Thomas J. Francella, Jr., certify that on August 7, 2026, I caused a copy of the foregoing document to be served via NEF upon all parties receiving such service.

Dated: August 7, 2026

RAINES FELDMAN LITTRELL, LLP

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