Docket #1710 Date Filed: 11/04/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	:	**Chapter 11**
CANO HEALTH, INC.,	:	**Case No. 24-10164 (KBO)**
	:	**Re: Docket No. 1699**
Reorganized Debtor. [1]	:	

CERTIFICATION OF COUNSEL REGARDING ORDER SUSTAINING REORGANIZED DEBTORS' SIXTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN OVERSTATED CLAIMS

The undersigned hereby certifies as follows:

1. On October 1, 2026, Cano Health, Inc. (together with the Closed Case Debtors, the "**Reorganized Debtors**," and prior to the Effective Date,[2] the "**Debtors**"), as the Reorganized Debtor in the above-captioned chapter 11 case, filed the *Reorganized Debtors Sixth Omnibus (Substantive) Objection to Certain Overstated Claims* [Docket No. 1699] (the "**Objection**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). Attached thereto as **Exhibit A** was a proposed form of order granting the relief requested in the Objection (the "**Proposed Order**").

2. Pursuant to the *Notice of Omnibus Objection and Hearing* filed with the Objection, objections or responses to the relief requested in the Objection, if any, were to be made

[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 meanings ascribed to such terms in the *Modified Fourth Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and Its Affiliated Debtors* [Docket No. 1125] (the "**Plan**").

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in writing and filed with the Court on or before October 22, 2026 at 4:00 p.m. (prevailing Eastern Time) (the "**Response Deadline**"). The Reorganized Debtors extended the Response Deadline for (i) Spencer Strawberry, Ltd ("**Spencer Strawberry**"), (ii) 2380-90 NW 7th Street, LLC ("**7th Street**"), and (iii) 2526 W. Sligh Ave., LLC ("**West Sligh Ave**.").

3. Prior to the Response Deadline, Page Plaza Acquisition, LP ("**Page Plaza**") filed a response to the objection [Docket No. 1704] (the "**Objection**"). In addition, Spencer Strawberry, 7th Street, and West Sligh Ave. (together with Page Plaza, Spencer Strawberry, and 7th Street, the "**Responding Parties**") responded informally to the Objection (the "**Informal Responses**" and, together with the Objection, the "**Responses**"). Other than the Responses, no objection or responsive pleading to the Objection has appeared on the Court's docket in these chapter 11 cases, and the Reorganized Debtors have received no informal responses to the Objection.

4. The Reorganized Debtors have prepared a revised form of Proposed Order (the "**Revised Order**") that resolves the Responses. The Revised Order otherwise sustains the Objection. A copy of the Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**. The Reorganized Debtors have circulated the Revised Order or discussed the relevant revisions made thereto with the Responding Parties and the Litigation Trust, and the aforementioned parties do not object to the entry of the Revised Order.

[*Remainder of page intentionally left blank*]

WHEREFORE, the Reorganized Debtors respectfully request that the Revised Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: November 4, 2026
Wilmington, Delaware

/s/ James F. McCauley

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Attorneys for the Reorganized Debtors

Exhibit 1

Revised 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. 1699**

ORDER SUSTAINING REORGANIZED DEBTORS' SIXTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN OVERSTATED CLAIMS

Upon the *Reorganized Debtors' Sixth Omnibus (Substantive) Objection to Certain Overstated Claims* (the "**Objection**"),[2] of Cano Health, Inc., for entry of an order reducing the amount of the overstated claims identified on **Schedule 1** attached hereto (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. §§ 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

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

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 Disputed Claims identified on **Schedule 1** hereto are reduced to the amounts set forth thereon (the "**Remaining Claims**"). The Remaining Claims 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 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.

5. 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.

6. 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.

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

8. This Order is immediately effective and enforceable.

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

[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.

Schedule 1

Amended and Superseded Claims

Claimant Name	Date Filed	Claim No.	Debtor	Asserted Amount	Remaining Amount	Reason
Comprehensive Health Initiative, LLC 5122 Maggiore St. Goral Gables, FL 33146	4/6/2024	341	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $853,666.09 (T) $853,666.09	(S) $0.00 (A) $0.00 (P) $0.00 (U) $275,420.16 (T) $275,420.16	Claimant filed to apply the cap on rejection damages set forth in section 502(b)(6) of the Bankruptcy Code.
First Priority Funding, LLC Attn: Shawn Bidsal 15821 Ventura Blvd., Suite 455 Encino, CA 91436	3/6/2024	72	Cano Health, Inc.	(S) $0.00 (A) $0.00 (P) $0.00 (U) $3,035,489.29 (T) $3,035,489.29	(S) $0.00 (A) $0.00 (P) $0.00 (U) $341,624.43 (T) $341,624.43	Claimant filed to apply the cap on rejection damages set forth in section 502(b)(6) of the Bankruptcy Code.
Page Plaza Acquisition, LP 145 Spring St., 4th Floor New York, NY 10012	3/15/2024	112	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $4,039,902.82 (T) $4,039,902.82	(S) $0.00 (A) $0.00 (P) $0.00 (U) $797,248.22 (T) $797,248.22	Claimant filed to apply the cap on rejection damages set forth in section 502(b)(6) of the Bankruptcy Code.
Park Centre Holdings, LLC C/O KEY Properties 1922 NE 149th St. North Miami, FL 33181 Law Offices of Robert F. Reynolds, P.A. 101 NE 3rd Ave., Suite 1800 Fort Lauderdale, FL 33301	7/3/2024	783	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $842,501.42 (T) $842,501.42	(S) $0.00 (A) $0.00 (P) $0.00 (U) $384,001.42 (T) $384,001.42	Claimant includes claims for costs that are subject to the cap, but do not increase the amount of the cap. Accordingly, such claimed amounts must be disallowed.

Claimant Name	Date Filed	Claim No.	Debtor	Asserted Amount	Remaining Amount	Reason
Rio Bravo Square, LLC Attn: Bruce Nolen 100 Sun Ave. NE, Suite 210 Albuquerque, NM 87109	4/3/2024	314	Cano Health New Mexico, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $3,389,163.36 (T) $3,389,163.36	(S) $0.00 (A) $0.00 (P) $0.00 (U) $259,927.75 (T) $259,927.75	Claimant filed to apply the cap on rejection damages set forth in section 502(b)(6) of the Bankruptcy Code.
SKMV Realty, LLC Attn: Matthew J. Brown Dinsmore and Shohl, LLP 225 East Robinson St., Suite 600 Orlando, FL 32801	4/19/2024	533	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $1,925,320.20 (T) $1,925,320.20	(S) $0.00 (A) $0.00 (P) $0.00 (U) $485,030.20 (T) $485,030.20	Claimant filed to apply the cap on rejection damages set forth in section 502(b)(6) of the Bankruptcy Code.
Spencer Strawberry, Ltd. Attn: Brian B. Kolpatrick 1233 West Loop South, Suite 800 Houston, TX 77027	2/15/2024	18	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $734,658.49 (T) $734,658.49	(S) $0.00 (A) $0.00 (P) $0.00 (U) $549,501.68 (T) $549,501.68	Claimant includes claims for costs that are subject to the cap, but do not increase the amount of the cap. Accordingly, such claimed amounts must be disallowed.

Exhibit 2

Blackline

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. —1699**

ORDER SUSTAINING REORGANIZED DEBTORS' SIXTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CERTAIN OVERSTATED CLAIMS

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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.

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5. 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.

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

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Schedule 1

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~~2380 90 NW 7 Street, LLC Attn: Ric Arcadi 16773 West Park Cir. Chagrin Falls, OH 44023~~	~~4/19/2024~~	~~531~~	~~Cano Health, LLC~~	~~(S) $0.00 (A) $0.00 (P) $0.00 (U) $2,405,431.56 (T) $2,405,431.56~~	~~(S) $0.00 (A) $0.00 (P) $0.00 (U) $1,955,006.62 (T) $1,955,006.62~~	~~Claimant includes claims for costs that are subject to the cap, but do not increase the amount of the cap. Accordingly, such claimed amounts must be disallowed.~~
~~256 W. Sligh Ave., LLC Attn: Ric Arcadi 16773 West Park Circle Chagrin Falls, OH 44023~~	~~4/19/2024~~	~~536~~	~~Cano Health, LLC~~	~~(S) $0.00 (A) $0.00 (P) $0.00 (U) $1,641,232.24 (T) $1,641,232.24~~	~~(S) $0.00 (A) $0.00 (P) $0.00 (U) $842,507.16 (T) $842,507.16~~	~~Claimant includes claims for costs that are subject to the cap, but do not increase the amount of the cap. Accordingly, such claimed amounts must be disallowed.~~
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Park Centre Holdings, LLC C/O KEY Properties 1922 NE 149th St. North Miami, FL 33181 Law Offices of Robert F. Reynolds, P.A. 101 NE 3rd Ave., Suite 1800 Fort Lauderdale, FL 33301	7/3/2024	783	Cano Health, LLC	(S) $0.00 (A) $0.00 (P) $0.00 (U) $842,501.42 (T) $842,501.42	(S) $0.00 (A) $0.00 (P) $0.00 (U) $384,001.42 (T) $384,001.42	Claimant includes claims for costs that are subject to the cap, but do not increase the amount of the cap. Accordingly, such claimed amounts must be disallowed.
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