

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re	:	Chapter 11
	:	
CANO HEALTH, INC., et al.,	:	Case No. 24-10164 ()
	:	
Debtors.¹	:	(Joint Administration Requested)
	:	
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**MOTION OF DEBTORS PURSUANT TO
11 U.S.C. §§ 105(a), 107, AND 521(a)(1) AND FED. R. BANKR. P.
1007, 9018, AND 9037 FOR ENTRY OF ORDER (I) AUTHORIZING
IMPLEMENTATION OF PROCEDURES TO PROTECT CONFIDENTIAL
PATIENT INFORMATION AND (II) GRANTING RELATED RELIEF**

Cano Health, Inc. and certain of its subsidiaries, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, respectfully represent as follows:

Relief Requested

1. By this motion (the “**Motion**”), pursuant to sections 105(a), 107, and 521(a)(1) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rules 1007, 9018, and 9037 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rules 1007-1, 9018-1, and 9037-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Bankruptcy Rules**”), the Debtors request entry of an order (i) authorizing the implementation of procedures to protect confidential information and (ii) granting related relief.

¹ The last four digits of Cano Health, Inc.’s tax identification number are 4224. A complete list of the Debtors in the chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://www.kccllc.net/CanoHealth>. The Debtors’ mailing address is 9725 NW 117th Avenue, Miami, Florida 33178.



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. The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these chapter 11 cases.

4. Contemporaneously herewith, the Debtors have filed a motion requesting joint administration of their chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Local Bankruptcy Rule 1015-1.

5. The Debtors, together with their non-debtor affiliates, are one of the largest independent primary care physician groups in the United States. The Debtors commenced their chapter 11 cases on a prearranged basis with the support, pursuant to the terms of a restructuring support agreement (the “**Restructuring Support Agreement**”), of creditors holding approximately 86% of the Debtors’ secured revolving and term loan debt and approximately 92% of the Debtors’ senior unsecured notes (collectively, the “**Consenting Creditors**”). With the support of the Consenting Creditors, the Debtors are seeking to implement a comprehensive restructuring, which may be implemented through a chapter 11 plan or a sale of substantially all of the Debtors’ assets. The Debtors expect to file a chapter 11 plan and disclosure statement in short order, consistent with the terms of the Restructuring Support Agreement, and to efficiently and expeditiously proceed through these cases towards emergence.

6. 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 (the "**Kent Declaration**") and the *Declaration of Clayton Gring in Support of the Debtors' First Day Relief* (the "**Gring Declaration**") and, together with the Kent Declaration, the "**First Day Declarations**"), each filed contemporaneously herewith and incorporated by reference herein.

Jurisdiction

7. 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.

8. Pursuant to Local Bankruptcy Rule 9013-1(f), the 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.

Confidentiality Protection Procedures

9. The Debtors are requesting approval of certain procedures to protect confidential information of current and former patients, whose information may be protected under HIPAA (as defined below) and Florida state law (collectively, the "**Patients**"). Specifically, the Debtors request that Kurtzman Carson Consultants LLC, the proposed claims and noticing agent in these chapter 11 cases (the "**Claims Agent**"), be allowed to prepare, pursuant to section 521(a)(1)(A) of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1), and Local Bankruptcy Rule 1007-1(a), a separate creditor matrix of the Patients (the "**Patient Matrix**") and, pursuant to section 521(a)(1)(B)(i) of the Bankruptcy Code, Bankruptcy Rule 1007(b)(1)(A), and Local Bankruptcy Rule 1007-1(a), separate schedules of claims that may be asserted by and against the

Patients (the “**Patient Schedules**”).² The Debtors request they not be required to file the Patient Matrix or the Patient Schedules with this Court but, instead, be allowed to file redacted versions of the Patient Matrix and the Patient Schedules that redact the Patients’ protected health information (“**PHI**”), such as the names, home and email addresses, phone numbers, account numbers, and any unique identifying numbers of the Patients³ (except those assigned by the Claims Agent to code data,⁴ such as “Patient 1”).

10. The Debtors request that the Claims Agent process Patients’ proofs of claim (“**Proofs of Claim**”) and, upon request, make available a summary of the total number and amount of all claims filed by Patients against the Debtors, which summary shall exclude any information subject to HIPAA, its associated regulations, and other privacy requirements. The Claims Agent shall make copies of any Proofs of Claim filed by Patients available to the Court for in camera review, and any such Proofs of Claim shall otherwise be maintained by the Claims Agent and the Debtors on a confidential basis and not subject to public dissemination or disclosure. To the extent any Patient discloses his or her own PHI in any pleading, notice, or other publicly available document, the Debtors request that they and their professionals shall be permitted, and to the extent required by the Bankruptcy Code, the Bankruptcy Rules, or any other applicable law, rule, or court order, directed to include such PHI in any subsequent pleading, notice, document, list, or other public disclosure made in connection with these chapter 11 cases, and such disclosure shall not be

² To the extent a Patient has filed a lawsuit against the Debtors, information about the lawsuit is not confidential and would be filed with this Court.

³ PHI includes information that “[r]elates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual.” 45 C.F.R. § 160.103. For the avoidance of doubt, all 18 identifiers set forth in 45 C.F.R. § 164.514(b)(2) must be removed or redacted given their classification as PHI.

⁴ See 45 C.F.R. § 164.514(b)(2)(i)(R).

deemed to be a “wrongful disclosure” within the meaning of HIPAA or any regulation promulgated thereunder.

11. Further, the Debtors request, to the extent any paper filed or to be filed with the Court in these chapter 11 cases (including the schedules of assets and liabilities and statements of financial affairs and certificates of service, as provided by Bankruptcy Rule 1007(b)) includes Patients’ PHI, the Debtors be authorized to redact the Patients’ PHI from such filing; *provided, however*, the Patient Matrix and the Patient Schedules, and any other papers filed in these chapter 11 cases from which the Debtors have redacted the Patients’ PHI may be reviewed without redactions by: (a) this Court, the United States Trustee for the District of Delaware (the “**U.S. Trustee**”), and counsel to any official committee appointed in these chapter 11 cases, in each case, upon request; (b) any applicable state regulatory agency (through the respective state attorney general)⁵; and (c) any other party in interest, that obtains, after notice and a hearing, authorization from this Court.

Basis for Relief

12. The Health Insurance Portability and Accountability Act of 1996 (“**HIPAA**”) creates a duty for healthcare providers to maintain the confidentiality of patient information. *See* 42 U.S.C. § 1320d–6(a). Pursuant to HIPAA, certain regulations concerning such duties are set forth in 45 C.F.R. §§ 160, 164. These regulations impose stringent standards

⁵ Under 45 C.F.R. §§ 164.512(f)(1)(ii)(A),(C), protected health information may be disclosed in response to “[a] court order . . . issued by a judicial officer [or] [a]n administrative request . . . provided that . . . [t]he information sought is relevant and material to a legitimate law enforcement inquiry[.]”

on healthcare providers and establish significant penalties for any healthcare provider that improperly uses or discloses patient information.

13. Because the Debtors are healthcare providers, and they contract with other business associates and affiliated healthcare providers, that transmit health information in electronic form, they may be considered “covered entities” or “business associates” under 45 C.F.R. § 160.103 and must therefore comply with the confidentiality requirements of HIPAA.⁶ Such requirements prevent the Debtors from disclosing PHI, as defined by HIPAA, except in limited circumstances. *See* 45 C.F.R. § 164.502. The Debtors could be subjected to significant monetary penalties for HIPAA violations, including disclosure of PHI that is not permitted. *See* 45 C.F.R. § 164.402.⁷ The penalties imposed for HIPAA violations can be imposed even if a person “did not know and, by exercising reasonable diligence, would not have known” that a violation occurred. 45 C.F.R. § 160.404(b)(2)(i).

14. Further penalties may also be imposed under state privacy acts for violation of privacy rules. For example, Florida, where all of the Debtors’ medical centers are located, imposes civil penalties ranging from \$1,000 to \$500,000 per violation for unauthorized disclosure of Personal Information, as defined in the Florida Information Protection Act of 2014. *See* Fla. Stat. § 501.171 (2014). In addition, subject to limited exceptions, under Florida law protected health information may not be disclosed without written authorization from the patient; violators

⁶ A “business associate” includes persons who create, receive, maintain, or transmit protected health information from a covered entity to provide management, legal, accounting, or consulting services for that covered entity. *See* 45 C.F.R. § 160.103. A “covered entity” includes, “a health care provider who transmits any health information in electronic form in connection with a transaction covered by this subchapter.” *Id.* Because the Claims Agent has confirmed it is compliant with and handles data in accordance with HIPAA, it will be able to compile the names and addresses of the Patients to serve necessary notices and compile the information needed for the Patient Schedules.

⁷ Under 45 C.F.R. § 160.404, monetary penalties of up to \$50,000 could be imposed for each violation, up to an aggregate of \$1,500,000 for identical violations occurring during a calendar year.

are subject to discipline by either the state attorney general or the appropriate licensing authority for a provider. *See* Fla. Stat. § 456.057.

15. The Debtors are also party to various agreements with healthcare providers that impose contractual obligations on the Debtors to comply with HIPAA and to protect PHI received from or used on behalf of these entities. Disclosure of PHI would result in direct liability under HIPAA and contractual liability under these agreements, which may threaten business relationships with healthcare providers. These healthcare providers constitute a key source of revenue for the Debtors and a failure to meet the Debtors' obligations under these agreements could hamper the Debtors' efforts to complete a successful restructuring transaction.

16. The requirements to maintain patient confidentiality under HIPAA and applicable state law conflict with the requirements placed on the Debtors to disclose information under the Bankruptcy Code, specifically the duty to file a list of all creditors under section 521(a)(1)(A) and the duty to file schedules of all assets and liabilities under section 521(a)(1)(B)(i). The Debtors, therefore, request PHI be protected (as set forth herein) pursuant to section 107(c) of the Bankruptcy Code, which provides that:

[t]he bankruptcy court, for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:

(A) Any means of identification . . . contained in a paper filed, or to be filed, in a case under [the Bankruptcy Code].

(B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1).

17. The Court may also approve the proposed confidentiality protection procedures pursuant to section 105(a) of the Bankruptcy Code, which authorizes the court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a).

18. In addition to the Bankruptcy Code, Bankruptcy Rule 9018 empowers a bankruptcy court, on motion, to enter any order that justice requires “to protect governmental matters that are made confidential by statute or regulation.” Fed. R. Bankr. P. 9018.

19. Similarly, such relief is authorized by the Local Bankruptcy Rules. Local Bankruptcy Rule 1007-1 provides “[i]f a filing party wishes to redact or omit information required by any Official Bankruptcy Form, such party must file a motion seeking approval to do so” Del. Bankr. L.R. 1007-1(a). To effectuate such request, Local Bankruptcy Rule 9018-1 provides “any entity seeking to file a document . . . under seal must file a motion requesting such relief” Del. Bankr. L.R. 9018-1(d)(i). Finally, Local Bankruptcy Rule 9037-1 requires the filer of a “document containing personal data identifiers” to “file a motion to redact” Del. Bankr. L.R. 9037-1(b).

20. The Debtors believe the relief requested herein balances the need to maintain confidentiality with respect to PHI under HIPAA and applicable state law with the need for disclosure under the Bankruptcy Code. The relief requested herein is commonly granted by courts in this district and other jurisdictions in comparable chapter 11 cases for debtors in the healthcare industry. *See, e.g., In re Am. Physician Partners, LLC*, Case No. 23-11469 (BLS) (Bankr. D. Del. Oct. 27, 2023) (Docket No. 296) (authorizing the debtors to implement procedures to maintain and protect confidential health information of current and former patients as required by HIPAA); *In re UpHealth Holdings, Inc.*, Case No. 23-11476 (LSS) (Bankr. D. Del. Oct. 24,

2023) (Docket No. 49) (authorizing the debtors to implement procedures to maintain and protect confidential health information of current and former patients as required by HIPAA, and confidential information of current and former employees); *In re Medly Health Inc.*, Case No. 22-11257 (KBO) (Bankr. D. Del. Jan. 6, 2023) (Docket No. 183) (authorizing the debtors to implement procedures to maintain and protect confidential health information of pharmacy patients as required by HIPAA); *In re Mariner Health Cent., Inc.*, Case No. 22-10877 (LSS) (Bankr. D. Del. Sept. 21, 2022) (Docket No. 34) (authorizing the debtors to implement procedures to maintain and protect confidential health information of current and former patients as required by HIPAA); *In re CMC II, LLC*, Case No. 21-10461 (JTD) (Bankr. D. Del. Apr. 1, 2021) (Docket No. 150) (authorizing the debtors to implement procedures to maintain and protect confidential health information of residents as required by HIPAA); *In re Genesis Care Pty Ltd.*, Case No. 23-90614 (DRJ) (Bankr. S.D. Tex. June 1, 2023) (Docket No. 74) (authorizing the debtors to implement procedures to maintain and protect confidential information of current and former patients as required by HIPAA, the debtors' employees, and the debtors' affiliated medical groups); *In re Envision Healthcare Corp.*, Case No. 23-90342 (CML) (Bankr. S.D. Tex. May 15, 2023) (Docket No. 119) (same).

21. Absent the relief requested herein, the Debtors may, by fulfilling their duty to disclose information under the Bankruptcy Code, (i) violate HIPAA or any other applicable healthcare privacy laws or other contractual obligations, thereby exposing them to severe monetary penalties that could threaten the Debtors' ability to consummate a successful restructuring transaction and (ii) unnecessarily and unlawfully jeopardize the privacy of their Patients.

Notice

22. Notice of this Motion will be provided to the following parties (each as defined in the First Day Declarations): (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) the holders of the thirty (30) largest unsecured claims against the Debtors on a consolidated basis; (c) the Internal Revenue Service; (d) the U.S. Securities and Exchange Commission; (e) the United States Attorney's Office for the District of Delaware; (f) Gibson, Dunn & Crutcher LLP, 200 Park Ave, New York, NY 10166 (Attn: Scott J. Greenberg, Esq. (SGreenberg@gibsondunn.com), Michael J. Cohen, Esq. (MCohen@gibsondunn.com), and Christina M. Brown, Esq. (Christina.Brown@gibsondunn.com)) and Pachulski, Stang, Ziehl & Jones LLP, 919 North Market Street #1700, Wilmington, Delaware 19801 (Attn: Laura Davis Jones, Esq. (ljones@pszjlaw.com) and James O'Neill, Esq. (joneill@pszjlaw.com)), as counsel to the Ad Hoc First Lien Group; (g) ArentFox Schiff LLP, 1301 Avenue of the Americas, 42nd Floor New York, NY 10019 (Attn: Jeffrey R. Gleit, Esq. (jeffrey.gleit@afslaw.com)), as counsel to the DIP Agent; (h) Freshfields Bruckhaus Deringer US LLP, 601 Lexington Avenue, New York, NY 10022 (Attn: Mark F. Liscio, Esq. (mark.liscio@freshfields.com) and Scott D Talmadge, Esq. (scott.talmadge@freshfields.com)), as counsel to the Agent under the CS Credit Agreement; (i) Proskauer Rose LLP, 70 West Madison, Suite 3800, Chicago, IL 60602 (Attn: Evan Palenschat, Esq. (EPalenschat@proskauer.com)), as counsel to the Agent under the Side-Car Credit Agreement; (j) U.S. Bank National Association, West Side Flats 60 Livingston Ave. EP-MN-WS3C Saint Paul, MN 55107 (Attn: Global Corporate Trust Services), the Indenture Trustee under the Senior Note Indenture; (k) the state attorneys general for states in which the Debtors conduct business; and (l) any party that is entitled to notice pursuant to Local Bankruptcy Rule 9013-1(m) (collectively, the "**Notice Parties**"). Notice of this Motion and any order entered hereon will be served in accordance with Local Bankruptcy Rule 9013-1(m).

23. The Debtors respectfully submit that no further notice is required. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

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WHEREFORE the 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: February 5, 2024
Wilmington, Delaware

/s/ Amanda R. Steele

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*Proposed Attorneys for the Debtors
and the Debtors in Possession*

Exhibit A

Proposed Order

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

	X	
	:	
In re	:	Chapter 11
	:	
CANO HEALTH, INC., et al.,	:	Case No. 24-10164 ()
	:	
Debtors.¹	:	(Jointly Administered)
	:	
	X	

**ORDER PURSUANT TO 11 U.S.C. §§ 105(a), 107, AND 521(a)(1)
AND FED. R. BANKR. P. 1007, 9018, AND 9037 (I) AUTHORIZING
IMPLEMENTATION OF PROCEDURES TO PROTECT CONFIDENTIAL
PATIENT INFORMATION AND (II) GRANTING RELATED RELIEF**

Upon the motion, dated February 5, 2024 (the “**Motion**”)² of Cano Health, Inc. and certain of its subsidiaries, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, pursuant to sections 105(a), 107, and 521(a)(1) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rules 1007, 9018, and 9037 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rules 1007-1, 9018-1, and 9037-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Bankruptcy Rules**”), for entry of an order (i) authorizing the implementation of procedures to protect confidential information and (ii) 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,

¹ The last four digits of Cano Health, Inc.’s tax identification number are 4224. A complete list of the Debtors in the chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.kccllc.net/CanoHealth>. The Debtors’ 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 Motion.

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 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 having reviewed the Motion; and the Court having held a hearing to consider the relief requested in the Motion (the “**Hearing**”); and upon the First Day Declarations and the record of the Hearing; and all objections to the relief requested in the Motion, if any, 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 Debtors, their 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 Claims Agent shall prepare and maintain the Patient Matrix but shall not disclose it to any other person, except as provided herein.
2. The Claims Agent shall prepare and maintain the Patient Schedules but shall not disclose them to any other person, except as provided herein.
3. The Claims Agent shall prepare redacted versions of the Patient Matrix and the Patient Schedules, which shall (a) redact all PHI, including but not limited to, the names, home and email addresses, phone numbers, account numbers, and any unique identifying numbers of the Patients (except those assigned by the Claims Agent to code data, such as “Patient 1”) of current

and former Patients; and (b) assign a unique identification number to each of the Patients (the “**Redacted Patient Matrix and Patient Schedules**”).

4. The Debtors are authorized to file the Redacted Patient Matrix and Patient Schedules with the Court in accordance with Bankruptcy Rule 1007.

5. The Debtors are authorized to file under seal with the Court the Patient Matrix and Patient Schedules.

6. The unredacted versions of the Patient Matrix and Patient Schedules shall not be made available to any party (other than the Court and those specified in Paragraph 7 of this Order) and may not be filed on the public docket and shall remain under seal until further order of the Court.

7. The Debtors are authorized to make the unredacted versions of the Patient Matrix and Patient Schedules available to (a) this Court, the U.S. Trustee, and counsel to any official committee appointed in these chapter 11 cases, in each case, upon request; (b) any applicable state regulatory agency (through the respective state attorney general); and (c) any other party in interest, but only after this Court, after notice and a hearing, enters an order authorizing such disclosure; *provided, that*, any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request.

8. The Debtors are authorized to redact from any document publicly available in these chapter 11 cases the Patients’ PHI.

9. If the Debtors serve any paper upon any person listed on the Debtors’ Patient Matrix or the Patient Schedules, the Debtors shall note in the respective certificate of service that the parties served include persons listed on the Patient Matrix or Patient Schedules, as applicable.

10. The Claims Agent shall process Patients' proofs of claim ("**Proofs of Claim**") and, upon request, make available a summary of the total number and amount of all claims filed by Patients against the Debtors, which summary shall exclude any information subject to HIPAA, its associated regulations, and other privacy requirements.

11. The Claims Agent shall make copies of any Proofs of Claim filed by Patients available to the Court for in camera review, and any such Proofs of Claim shall otherwise be maintained by the Claims Agent and the Debtors on a confidential basis and not subject to public dissemination or disclosure.

12. To the extent any Patient discloses his or her own PHI in any pleading, notice, or other publicly available document, the Debtors and their professionals shall be permitted, and to the extent required by the Bankruptcy Code, the Bankruptcy Rules, or any other applicable law, rule, or court order, directed to include such PHI in any subsequent pleading, notice, document, list, or other public disclosure made in connection with these chapter 11 cases, and such disclosure shall not be deemed to be a "wrongful disclosure" within the meaning of HIPAA or any regulation promulgated thereunder.

13. This Order does not apply to any information of Patients that have filed lawsuits against the Debtors, and the Debtors shall disclose information about such Patients as required under the Bankruptcy Rules.

14. Nothing herein precludes a party in interest's right to file a motion requesting that the Bankruptcy Court unseal the information redacted by this Order. The rights of all parties in these chapter 11 cases to object to the relief set forth in this Order, for any reason, including that the Debtors have not satisfied their burden under section 107(c) of the Bankruptcy Code, are hereby preserved.

15. The Debtors are authorized to take all reasonable actions necessary or appropriate to effectuate the relief granted in this Order.

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