

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

|                            |   |                                |
|----------------------------|---|--------------------------------|
| -----                      | X |                                |
|                            | : | <b>Chapter 11</b>              |
| <b>In re</b>               | : |                                |
|                            | : | <b>Case No. 24-10164 (KBO)</b> |
| <b>CANO HEALTH, INC.,</b>  | : |                                |
|                            | : |                                |
| <b>Debtor.<sup>1</sup></b> | : | <b>Re: Docket No. 1404</b>     |
| -----                      | X |                                |

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF REORGANIZED DEBTORS FOR ENTRY OF SECOND ORDER EXTENDING PERIOD WITHIN WHICH THE REORGANIZED DEBTORS AND LITIGATION TRUST MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND FED. R. BANKR. P. 9027 AND GRANTING RELATED RELIEF**

The undersigned hereby certifies that, as of the date hereof, Cano Health, Inc. (together with the Closed Case Debtors, the “**Reorganized Debtors**”), as the Reorganized Debtor in the above-captioned chapter 11 case, have received no answer, objection, or any other responsive pleading with respect to the *Motion of Reorganized Debtors for Entry of Second Order Extending Period Within Which the Reorganized Debtors and Litigation Trust May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. 9027 and Granting Related Relief* [Docket No. 1404] (the “**Motion**”) filed by the Debtors with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on September 3, 2024.

The undersigned further certifies that they have reviewed the Court’s docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to

<sup>1</sup> 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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the *Notice of Motion and Hearing* filed with the Motion, any objections or responses to the Motion were to be filed no later than September 17, 2024 at 4:00 p.m. (prevailing Eastern Time).

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

Dated: September 18, 2024  
Wilmington, Delaware

/s/ James F. McCauley

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**EXHIBIT A**

**Proposed Order**

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

|                            |   |                                 |
|----------------------------|---|---------------------------------|
|                            | X |                                 |
|                            | : |                                 |
| <b>In re</b>               | : | <b>Chapter 11</b>               |
|                            | : |                                 |
| <b>CANO HEALTH, INC.,</b>  | : | <b>Case No. 24– 10164 (KBO)</b> |
|                            | : |                                 |
| <b>Debtor.<sup>1</sup></b> | : | <b>Re: Docket No. 1404</b>      |
|                            | X |                                 |

**SECOND ORDER EXTENDING PERIOD WITHIN WHICH REORGANIZED DEBTORS AND LITIGATION TRUST MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND FED. R. BANKR. P. 9027 AND GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)<sup>2</sup> of Cano Health, Inc. (together with the Closed Case Debtors, “**Reorganized Debtors**,” and prior to the Effective Date (as defined below), the “**Debtors**”), as Reorganized Debtor in the above-captioned chapter 11 case, 28 U.S.C. § 1452 and Rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order extending the time by which the Reorganized Debtors and Litigation Trust may file notices of removal under Bankruptcy Rule 9027 and granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and §1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

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 upon any hearing held on the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing the relief requested in the Motion is in the best interests of the Reorganized Debtors, the Debtors' estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The Motion is granted to the extent set forth herein.
2. The time period provided under Bankruptcy Rules 9027(a)(2) and 9027(a)(3) within which the Reorganized Debtors and the Litigation Trust may file notices of removal of any and all civil actions is extended through and including January 2, 2025, to the extent that the time period for filing any such notices of removal expires on or before that date.
3. This Order shall be without prejudice to (a) any position the Reorganized Debtors, the Litigation Trust, or their successors in interest may take regarding whether section 362 of the Bankruptcy Code applies to stay any pending civil action in which any Debtor or Reorganized Debtor is a party and (b) the rights of the Reorganized Debtors, the Litigation Trust, or their successors in interest to seek from this Court further extensions of the period within which the Reorganized Debtors and Litigation Trust may file notices of removal under Bankruptcy Rule 9027(a).

4. The Reorganized Debtors are authorized to take all reasonable actions necessary or appropriate to implement the relief granted in this Order.

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