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

In re:	)	Chapter 11
	)	
CANO HEALTH, INC. et al.,	)	Case No. 24-10164 (KBO)
	)	
Del	otors.	(Jointly Administered)

## MEDCLOUD DEPOT LLC'S RE-NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that Creditor, MedCloud Depot, LLC, by and through its counsel and pursuant to prior served Subpoena, Rule 26 of the Federal Rules of Civil Procedure made applicable in this proceeding by Rule 7026 of the Federal Rules of Bankruptcy Procedure, and Rule 30 of the Federal Rules of Civil Procedure made applicable in this proceeding by Rule 7030 of the Federal Rules of Bankruptcy Procedure, will take the deposition of Abraham Quintero via Zoom link, under oath as follows:

# Location, via Zoom link: https://us02web.zoom.us/j/83516209826?pwd=bbCYA7m4daDKxxnFazzCANTK4XIU9q.1 Date: Friday, November 8, 2024 Time: 1:00 PM, or upon conclusion of deposition of Javier Machin

The deposition will be taken upon oral examination and recorded by audio, audiovisual or stenographic means before a Notary Public or other person authorized by law to administer oaths and to record the testimony. The examination may continue until completed. The deposition is being taken for the purpose of discovery, for use at trial or hearing, and for such other purposes as

are permitted by the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

Date: October 22, 2024 Wilmington, DE

#### SULLIVAN · HAZELTINE · ALLINSON LLC

/s/ E.E. Allinson III

Elihu E. Allinson, III, Esq. (3476) 919 North Market Street, Suite 420

Wilmington, DE 19801

Email: <u>zallinson@sha-llc.com</u>

Phone: (302) 428-8191 Fax: (302) 428-8195

Attorneys for MedCloud Depot, LLC

and

## **Aaronson Schantz Beiley P.A**

s/ Geoffrey S. Aaronson

Geoffrey S. Aaronson, Esq.

Fla. Bar No. 349623

One Biscayne Tower, Suite 3450

2 S. Biscayne Boulevard Miami, Florida 33131

Email: gaaronson@aspalaw.com

Phone: (786) 594-3000 Fax: (305) 424-9336

Attorneys for MedCloud Depot, LLC

cc: Court Reporter (U.S. Legal)

#### **CERTIFICATE OF SERVICE**

I, Geoffrey S. Aaronson, hereby certify that, on October 22, 2024, I caused one copy of the foregoing *MedCloud Depot, LLC's Notice of Taking Deposition* to be served on the parties listed below via email.

Counsel to the Debtors:

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins, Esq. Michael J. Merchant, Esq. Amanda R. Steele, Esq. James F. McCauley, Esq. One Rodney Square 920 North King Street Wilmington, DE 19801

collins@rlf.com merchant@rlf.com steele@rlf.com mccauley@rlf.com WEIL, GOTSHAL & MANGES LLP

Gary T. Holtzer, Esq.
Jessica Liou, Esq.
Matthew P. Goren, Esq.
767 Fifth Avenue
New York, NY 10153
gary.holtzer@weil.com
jessica.liou@weil.com
matthew.goren@weil.com

U.S. Trustee:

Benjamin A. Hackman Office of the United States Trustee 844 King Street

Suite 2207 Wilmington, DE 19801

benjamin.a.hackman@usdoj.gov

Jonathan Lipshie U.S. Trustee Office 844 N. King Street P.O. Box 3700

Wilmington, DE 19801 jon.lipshie@usdoj.gov

Counsel to the Official Committee of Unsecured Creditors:

COLE SCHOTZ P.C.
Justin R. Alberto, Esq.
Patrick J. Reilley, Esq.
Andrew J. Roth-Moore, Esq,
500 Delaware Avenue, Suite 1410

Wilmington, DE 19801 jalberto@coleschotz.com

preilley@coleschotz.com aroth-moore@coleschotz.com Kristopher M. Hansen, Esq. Erez Gilad, Esq. Ryan Montefusco, Esq.

PAUL HASTINGS LLP

Jillian McMillan, Esq.

200 Park Ave

New York, NY 10166 krishansen@paulhastings.com

erezgilad@paulhastings.com

ryanmontefusco@paulhastings.com jillianmcmillan@paulhastings.com

COLE SCHOTZ P.C. Seth Van Aalten, Esq.

1325 Avenue of the Americas 19th Floor

New York, NY 10019

svanaalten@coleschotz.com

PAUL HASTINGS LLP Schlea Thomas, Esq. 600 Travis Street 58th Floor Houston, TX 77002

schleathomas@paulhastings.com

s/ Geoffrey S. Aaronson

Geoffrey S. Aaronson, Esq.