

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. 1525</b>     |
| -----                      | X |                                |

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF REORGANIZED DEBTORS FOR ENTRY OF ORDER (I) EXTENDING THE CLAIMS OBJECTION DEADLINE AND (II) 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**,” and prior to the Effective Date (as defined below), the “**Debtors**”), as the Reorganized Debtor in the above-captioned chapter 11 case, has received no answer, objection, or any other responsive pleading with respect to the *Motion of Reorganized Debtors for Entry of Order (I) Extending the Claims Objection Deadline and (II) Granting Related Relief* [Docket No. 1525] (the “**Motion**”) filed by the Reorganized Debtor with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on December 23, 2024.

The undersigned further certifies that they have reviewed the Court’s docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, any objections or responses to the Motion were to be filed no later than January 6, 2025 at 4:00 p.m. (prevailing Eastern Time).

<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.



241016425010900000000001

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: January 9, 2025  
Wilmington, Delaware

/s/ James F. McCauley

RICHARD, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)

Michael J. Merchant (No. 3854)

Amanda R. Steele (No. 5530)

James F. McCauley (No. 6991)

One Rodney Square

920 North King Street

Wilmington, Delaware 19801

Telephone: (302) 651-7700

Emails: collins@rlf.com

merchant@rlf.com

steele@rlf.com

mccauley@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP

Gary T. Holtzer (admitted *pro hac vice*)

Jessica Liou (admitted *pro hac vice*)

Matthew P. Goren (admitted *pro hac vice*)

Kevin Bostel (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Emails: gary.holtzer@weil.com

jessica.liou@weil.com

matthew.goren@weil.com

kevin.bostel@weil.com

*Attorneys for the Reorganized Debtors*

**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. 1525</b>      |
|                            | X |                                 |

**ORDER (I) EXTENDING THE CLAIMS OBJECTION  
DEADLINE AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)<sup>2</sup> of Cano Health, Inc. (together with the Closed Case Debtors, the “**Reorganized Debtors**,” and prior to the Effective Date (as defined below), the “**Debtors**”), as Reorganized Debtor in the above-captioned chapter 11 case, for entry of an order extending the Claim Objection Deadline by 180 days, without prejudice to the Reorganized Debtors’ right to Request Additional Extensions, 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 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the

---

<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.

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 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 Claims Objection Deadline is hereby extended through and including June 24, 2025.
3. This Order is without prejudice to the Reorganized Debtors' right to request additional extensions of the Claims Objection Deadline.
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.