

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 (KBO)
Debtors.¹ : (Jointly Administered)
----- X

NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MAY 9, 2024 AT 9:30 A.M. (ET)

***THE HEARING HAS BEEN CANCELLED AND IS ADJOURNED TO
MAY 14, 2024 AT 1:30 P.M. (ET) WITH PERMISSION FROM THE COURT.***

I. MATTER GOING FORWARD:

1. Motion to File Under Seal Portions of the Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief [[Docket No. 760](#); filed May 2, 2024]

Response/Objection Deadline: at the hearing

Responses/Objections Received: None at this time

Related Documents:

- i. Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of

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 Amended agenda items appear in bold.



Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief (SEALED) [Docket No. 716; filed May 1, 2024]

- ii. Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief (REDACTED) [[Docket No. 759](#); filed May 2, 2024]

Status: **The hearing on this matter is adjourned to May 14, 2024 at 1:30 p.m. (ET).**

II. DISCLOSURE STATEMENT:

- 2. Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief [[Docket No. 501](#); filed March 22, 2024]

Response/Objection Deadline: April 29, 2024 at 5:00 p.m. (ET); extended to May 1, 2024 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors (the “Creditors’ Committee”)

Responses/Objections Received:

- A. Humana’s Objection to the [Proposed] Disclosure Statement for Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc and its Affiliated Debtors [[Docket No. 697](#); filed April 29, 2024]
- B. Objection of Lead Plaintiff Gundelio Fundora, on Behalf of Himself and all Others Similarly Situated, to Approval of the Debtors’ Disclosure Statement [[Docket No. 698](#); filed April 29, 2024]
- C. Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of

Proposed Plan, and (V) Granting Related Relief (SEALED) [Docket No. 716; filed May 1, 2024]

- D. Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief (REDACTED) [[Docket No. 759](#); filed May 2, 2024]
- E. Informal comments from the Office of the United States Trustee for the District of Delaware
- F. Informal comments from MSP Recovery Inc.
- G. Informal comments from Credit Suisse AG, Cayman Island Branch, as First Lien Agent

Related Documents:

- i. Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 498](#); filed March 22, 2024]
- ii. [Proposed] Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 499](#); filed March 22, 2024]
- iii. Notice of Hearing to Consider Approval of Proposed Disclosure Statement of Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 502](#); filed March 22, 2024]
- iv. Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 671](#); filed April 22, 2024]
- v. [Proposed] Disclosure Statement for Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 672](#); filed April 22, 2024]
- vi. Notice of Blacklines of (I) Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors, and (II) [Proposed] Disclosure Statement for Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 673](#); filed April 22, 2024]
- vii. Motion to File Under Seal Portions of the Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights of the Official

Committee of Unsecured Creditors with Respect to Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief [[Docket No. 760](#); filed May 2, 2024]

- viii. Debtors' Reply in Support of Motion to Approve Disclosure Statement and Related Solicitation Procedures [[Docket No. 771](#); filed May 6, 2024]
- ix. Reply of DIP Lenders and Ad Hoc First Lien Group in Support of [Proposed] Disclosure Statement for Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 772](#); filed May 6, 2024]
- x. Second Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 773](#); filed May 6, 2024]
- xi. [Proposed] Disclosure Statement for Second Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 774](#); filed May 6, 2024]
- xii. Notice of Blacklines of (I) Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors, and (II) [Proposed] Disclosure Statement for Amended Joint Chapter 11 Plan of Reorganization of Cano Health, Inc. and its Affiliated Debtors [[Docket No. 775](#); filed May 6, 2024]
- xiii. Notice of Filing of Revised Proposed Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief [[Docket No. 776](#); filed May 6, 2024]

Status: The hearing on this matter is adjourned to May 14, 2024 at 1:30 p.m. (ET).

Dated: May 8, 2024
Wilmington, Delaware

/s/ Michael J. Merchant

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*)
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

*Attorneys for the Debtors
and the Debtors in Possession*