

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

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON APRIL 16, 2024 AT 10:30 A.M. (ET)

This proceeding will be conducted remotely via Zoom.

Please refer to Judge Owens's Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-karen-b-owens>)
and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>)
for information on the method of allowed participation (video or audio), Judge Owens's
expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless
otherwise noticed using the [eCourtAppearances](#) tool available on the Court's website.

I. ADJOURNED MATTER:

1. Primary Care Holdings II, LLC's Motion for Relief from Stay to Effectuate a Setoff
[[Docket No. 511](#)]; filed March 25, 2024]

Response/Objection Deadline: April 8, 2024 at 4:00 p.m. (ET); extended to
April 25, 2024 at 4:00 p.m. (ET) for the
Debtors

Responses/Objections: None at this time

Status: The hearing on this matter is adjourned to the hearing scheduled for May 2,
2024 at 9:30 a.m. (ET).

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.



II. WITHDRAWN MATTER:

2. Motion of Debtors Pursuant to 11 U.S.C. §§ 105 and 107, Fed. R. Bankr. P. 9018, and Del. Bankr. L.R. 9018-1 for Entry of an Order (I) Authorizing Debtors to File Under Seal Certain Commercially Sensitive Information in the MSP Recovery Shares Sale Motion, the Sheehan Declaration in Support Thereof, and the Related Motion to Shorten and (II) Granting Related Relief [[Docket No. 205](#); filed February 29, 2024]

Response/Objection Deadline: March 14, 2024 at 4:00 p.m. (ET); extended to March 21, 2024 at 4:00 p.m. (ET) for the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”)

Responses/Objections Received:

- A. Objection of the United States Trustee to Debtors’ Motion to Seal [[Docket No. 491](#); filed March 21, 2024]

Related Documents:

- i. Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief (Sealed) [[Docket No. 198](#); filed February 28, 2024]
- ii. Declaration of Michael Sheehan in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief (Sealed) [[Docket No. 199](#); filed February 28, 2024]
- iii. Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief (Redacted) [[Docket No. 200](#); filed February 28, 2024]
- iv. Declaration of Michael Sheehan in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief (Redacted) [[Docket No. 201](#); filed February 28, 2024]
- v. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, Fed. R. Bankr. P. 9006(c)(1) and Del. Bankr. L. R. 9006-1 for Entry of Order Shortening Notice and Objection Periods with Respect to Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief (Sealed) [[Docket No. 202](#); filed February 28, 2024]

- vi. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, Fed. R. Bankr. P. 9006(c)(1) and Del. Bankr. L. R. 9006-1 for Entry of Order Shortening Notice and Objection Periods with Respect to Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief (Redacted) [[Docket No. 203](#); filed February 28, 2024]
- vii. Order Shortening Notice and Objection Periods with Respect to Motion of Debtors Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief [[Docket No. 204](#); entered February 29, 2024]
- viii. Order Pursuant to 11 U.S.C. §§ 363 and 105(a) and Fed. R. Bankr. P. 2002 and 6004 (I) Authorizing Debtors to Sell Shares of MSP Recovery, Inc. and (II) Granting Related Relief [[Docket No. 328](#); entered March 7, 2024]
- ix. Notice of Withdrawal [[Docket No. 630](#); filed April 11, 2024]
- x. Notice of Filing of Unredacted Versions of MSP Recovery Shares Sale Motion and Related Pleadings [[Docket No. 632](#); filed April 11, 2024]

Status: On April 11, 2024, the Debtors withdrew this Motion. Accordingly, a hearing on this matter is no longer necessary.

III. RESOLVED MATTERS:

- 3. (I) Request for Payment of Administrative Expense, in the Alternative, (II) Motion for Relief from Stay, and (III) Motion to Compel, Assumption or Rejection of Syncrasy Software License Agreement, and (IV) Notice of Debtors' Breach of Syncrasy Software License Agreement [[Docket No. 481](#); filed March 19, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections: None

Related Documents:

- i. Declaration in Support of: Request for Payment of Administrative Expense; in the Alternative, Motion for Relief from Stay; and Motion to Compel Assumption or Rejection of Syncrasy Software License Agreement and Notice of Debtors' Breach of Syncrasy Software License Agreement [[Docket No. 482](#); filed March 19, 2024]
- ii. MedCloud Depot, LLC's Motion for Rule 2004 Examination of the Debtors [[Docket No. 506](#); filed March 22, 2024]
- iii. MedCloud Depot LLC's 30(b)(6) Notice of Deposition [[Docket No. 493](#); filed March 21, 2024]

- iv. Debtors' Combined (I) Opposition to MedCloud Depot LLC's Motion for Rule 2004 Examination of the Debtors and (II) Motion to Quash MedCloud Depot LLC's Rule 30(b)(6) Notice [[Docket No. 531](#); filed March 28, 2024]
- v. Certification of Counsel Regarding Order Approving Stipulation Resolving MedCloud Depot LLC's Administrative Expense Motion and Related Discovery Disputes [[Docket No. 639](#); filed April 11, 2024]
- vi. Order Approving Stipulation Resolving MedCloud Depot LLC's Administrative Expense Motion and Related Discovery Disputes [[Docket No. 641](#); entered April 12, 2024]

Status: On April 12, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 4. Application of the Official Committee of Unsecured Creditors for Entry of an Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Counsel to the Committee, Effective as of February 22, 2024 [[Docket No. 500](#); filed March 22, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee

Related Documents:

- i. Certification of Counsel Regarding the Application of the Official Committee of Unsecured Creditors for Entry of an Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Counsel to the Committee, Effective as of February 22, 2024 [[Docket No. 626](#); filed April 10, 2024]
- ii. Order Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of February 22, 2024 [[Docket No. 631](#); entered April 11, 2024]

Status: On April 11, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

- 5. Application of Official Committee of Unsecured Creditors for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Employment and Retention of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of February 22, 2024 [[Docket No. 503](#); filed March 22, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections: None

Related Documents:

- i. Certificate of No Objection Regarding the Application of Official Committee of Unsecured Creditors for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Employment and Retention of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of February 22, 2024 [[Docket No. 627](#); filed April 10, 2024]
- ii. Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Employment and Retention of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of February 22, 2024 [[Docket No. 633](#); entered April 11, 2024]

Status: On April 11, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

6. Application for Entry of an Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Genesis Credit Partners LLC as Financial Advisors to the Official Committee of Unsecured Creditors, Effective as of March 21, 2024 [[Docket No. 504](#); filed March 22, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections: None

Related Documents:

- i. Certificate of No Objection Regarding the Application for Entry of an Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Genesis Credit Partners LLC as Financial Advisors to the Official Committee of Unsecured Creditors, Effective as of March 21, 2024 [[Docket No. 628](#); filed April 10, 2024]
- ii. Order Authorizing and Approving the Retention and Employment of Genesis Credit Partners LLC as Financial Advisors to the Official Committee of Unsecured Creditors, Effective as of March 21, 2024 [[Docket No. 634](#); entered April 11, 2024]

Status: On April 11, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

7. Application for Entry of an Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Force Ten Partners, LLC as Financial Advisors to the Official Committee of Unsecured Creditors, Effective as of February 22, 2024 and Through March 20, 2024 [[Docket No. 505](#); filed March 22, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections: None

Related Documents:

- i. Certificate of No Objection Regarding the Application for Entry of an Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Force Ten Partners, LLC as Financial Advisors to the Official Committee of Unsecured Creditors, Effective as of February 22, 2024 and Through March 20, 2024 [[Docket No. 629](#); filed April 10, 2024]
- ii. Order Authorizing and Approving the Retention and Employment of Force Ten Partners, LLC as Financial Advisors to the Official Committee of Unsecured Creditors, Effective as of February 22, 2024 and Through March 20, 2024 [[Docket No. 635](#); entered April 11, 2024]

Status: On April 11, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

8. Second Omnibus Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 365(a), and 554(a) and Fed. R. Bankr. P. 6006 and 6007 (I) Authorizing the Debtors to (A) Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property, and (B) Abandon *De Minimis* Property in Connection Therewith, and (II) Granting Related Relief [[Docket No. 533](#); filed March 29, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from SVF Transal Park, LLC

Related Documents:

- i. Declaration of Clayton Gring in Support of Second Omnibus Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 365(a), and 554(a) and Fed. R. Bankr. P. 6006 and 6007 (I) Authorizing the Debtors to (A) Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property, and (B) Abandon *De Minimis* Property in Connection Therewith, and (II) Granting Related Relief [[Docket No. 534](#); filed March 29, 2024]

- ii. Certification of Counsel Regarding Revised Order Pursuant to 11 U.S.C. §§ 105(a), 365(a), and 554(a) and Fed. R. Bankr. P. 6006 and 6007 (I) Authorizing the Debtors to (A) Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property, and (B) Abandon *De Minimis* Property in Connection Therewith, and (II) Granting Related Relief [[Docket No. 638](#); filed April 11, 2024].
- iii. Order Pursuant to 11 U.S.C. §§ 105(a), 365(a), and 554(a) and Fed. R. Bankr. P. 6006 and 6007 (I) Authorizing the Debtors to (A) Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property, and (B) Abandon *De Minimis* Property in Connection Therewith, and (II) Granting Related Relief [[Docket No. 640](#); entered April 12, 2024].

Status: On April 12, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

IV. MATTERS FILED UNDER CERTIFICATION:

- 9. Debtors' Motion Pursuant to 11 U.S.C. §§ 363 and 105(a) for an Order (I) Authorizing and Approving Procedures for the Sale, Transfer, or Acquisition of Certain *De Minimis* Assets, and (II) Granting Related Relief [[Docket No. 519](#); filed March 26, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee
- B. Informal comments from the Official Committee of Unsecured Creditors

Related Documents:

- i. Certification of Counsel Regarding Revised Order Pursuant to 11 U.S.C. §§ 363 and 105(a) (I) Authorizing and Approving Procedures for the Sale, Transfer, or Acquisition of Certain *De Minimis* Assets, and (II) Granting Related Relief [[Docket No. 643](#); filed April 12, 2024]

Status: On April 12, 2024, the Debtors filed a revised form of order under certification of counsel in connection with this matter. Accordingly, a hearing with respect to this matter is only required to the extent that the Court has any questions or concerns.

- 10. Motion of Dental Excellence Partners LLC for Entry of an Order (I) Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) and (d)(2), to the Extent Applicable, and (II) Granting Related Relief [[Docket No. 529](#); filed March 28, 2024]

Response/Objection Deadline: April 9, 2024 at 4:00 p.m. (ET); extended to April 12, 2024 at 12:00 p.m. (ET) for the Debtors

Responses/Objections: None

Related Documents:

- i. Certification of Counsel Regarding Stipulation Resolving Dental Excellence Partners LLC's Motion for Relief from the Automatic Stay [[Docket No. 642](#); filed April 12, 2024]

Status: The Debtors and Dental Excellence Partners LLC ("**Dental Excellence**") have resolved this matter. On April 12, 2024, Dental Excellence filed a proposed form of order approving a stipulation under certification of counsel reflecting such resolution. Accordingly, a hearing on this matter is only necessary to the extent the Court has any questions or concerns.

Dated: April 12, 2024
Wilmington, Delaware

/s/ Amanda R. Steele

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*