IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re : Chapter 11

CANO HEALTH, INC., et al., : Case No. 24–10164 (KBO)

Debtors.¹ : (Joint Administration Requested)

NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED FOR FEBRUARY 6, 2024 AT 2:00 P.M. (EASTERN STANDARD TIME), BEFORE THE HONORABLE KAREN B. OWENS, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE²

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 ONE-HOUR PRIOR TO THE HEARING UNLESS OTHERWISE NOTICED USING THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE.

PLEASE TAKE NOTICE that beginning on February 4, 2024, the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") filed the following voluntary petitions

All motions and other pleadings referenced herein are available online at the following address: https://www.kccllc.net/CanoHealth.



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.

(collectively, the "**Petitions**") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

A. <u>Voluntary Petitions</u>:

- 1. Cano Health, Inc.
- 2. Primary Care (ITC) Intermediate Holdings, LLC
- 3. Cano Health, LLC
- 4. Cano Health Nevada Network, LLC
- 5. Cano Occupational Health, LLC
- 6. American Choice Healthcare, LLC
- 7. Cano PCP Wound Care, LLC
- 8. <u>Cano Personal Behavior LLC</u>
- 9. Cano PCP, LLC
- 10. Cano Behavior Health LLC
- 11. Cano Belen, LLC
- 12. Cano Health New Mexico LLC
- 13. Complete Medical Billing and Coding Services, LLC
- 14. Cano Health of Puerto Rico LLC
- 15. Cano Health of Florida, LLC
- 16. Cano Health CA1 MSO LLC
- 17. Comfort Pharmacy 2, LLC
- 18. Cano Medical Center of West Florida, LLC
- 19. CH Dental Administrative Services LLC
- 20. DGM MSO, LLC
- 21. Cano Research LLC
- 22. Cano PCP MSO, LLC
- 23. Cano HP MSO, LLC
- 24. ACH Management Services, LLC
- 25. CHPR MSO LLC
- 26. Orange Healthcare Administration, LLC
- 27. Orange Care Group South Florida Management Services Organization, LLC
- 28. Orange Accountable Care Organization of South Florida LLC
- 29. Orange Accountable Care Organization, LLC
- 30. American Choice Commercial ACO, LLC
- 31. Orange Care IPA of New York, LLC
- 32. Orange Care IPA of New Jersey, LLC
- 33. Total Care ACO, LLC
- 34. Cano Health CA1, LLC
- 35. <u>Cano Health Illinois 1 MSO, LLC</u>
- 36. Solis Network Solutions, LLC
- 37. Physicians Partners Group Merger, LLC
- 38. Physicians Partners Group Puerto Rico, LLC
- 39. Physicians Partners Group of FL, LLC
- 40. PPG Puerto Rico Blocker, Inc.
- 41. Physicians Partners Group Puerto Rico, LLC
- 42. Cano Health Illinois Network, LLC

- 43. <u>Cano Pharmacy, LLC</u>
- 44. IFB Pharmacy, LLC
- 45. Belen Pharmacy Group, LLC
- 46. University Health Care Pharmacy, LLC
- 47. Cano Health New York, IPA, LLC
- 48. Clinical Research of Hollywood, P.A.

PLEASE TAKE FURTHER NOTICE that in addition to the Petitions, the Debtors have filed the following first day motions and related documents (collectively, the "First Day Motions"):

B. First Day Declarations:

- 49. Declaration of Mark Kent in Support of Debtors' Chapter 11 Petitions [Docket No. 14; filed February 5, 2024]
- 50. Declaration of Clayton Gring in Support of First Day Relief [Docket No. 15; filed February 5, 2024]

C. <u>First Day Motions</u>:

- 51. Motion of Debtors Pursuant to Fed. R. Bankr. P. 1015(b) for Entry of Order Directing Joint Administration of Related Chapter 11 Cases [Docket No. 2; filed February 5, 2024]
- 52. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for (I) Authority (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Status, (D) Grant Adequate Protection, (D) Modify the Automatic Stay, and (E) Schedule a Final Hearing and (II) Related Relief [Docket No. 16; filed February 5, 2024]
- 53. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 345, 363, 364, 503, and 541 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Existing Cash Management Systems, Bank Accounts, and Business Forms, (B) Implement Ordinary Course Changes to Cash Management System, and (C) Honor Certain Related Prepetition Obligations, (II) (A) Authorizing Continuation of Intercompany Transactions and Physician Affiliate Transfers and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims, (III) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b), (IV) Waiving Certain Requirements, and (V) Granting Related Relief [Docket No. 3; filed February 5, 2024]
- 54. Motion of Debtors Pursuant to 11 U.S.C §§ 105(a), 362(d), and 363(b) and Fed. R. Bankr. P. 4001 for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain their Insurance Policies, Surety Bond Program, and Letters of Credit, and (B) Honor all Insurance, Surety Bond and Letters of Credit

- Obligations, (II) Modifying Automatic Stay, and (III) Granting Related Relief [Docket No. 4; filed February 5, 2024]
- Motion of Debtors Pursuant to 11 U.S.C. §§ 366 and 105(a) and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, and (IV) Granting Related Relief [Docket No. 5; filed February 5, 2024]
- 56. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507(a) and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Reimbursable Expenses, and Other Obligations on Account of Compensation and Benefits Programs and (B) Continue Compensation and Benefits Programs in the Ordinary Course, and (II) Granting Related Relief [Docket No. 6; filed February 5, 2024]
- 57. Motion of Debtors Pursuant to 11 U.S.C §§ 105(a), 363(b), 507(a), and 541(d) for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Taxes and Fees, and (II) Granting Related Relief [Docket No. 7; filed February 5, 2024]
- 58. Motion of Debtors Pursuant to 11 U.S.C. §§ 362 and 105(a) for Entry of Interim and Final Orders (I) Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors and (II) Granting Related Relief [Docket No. 8; filed February 5, 2024]
- 59. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(b) for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of (A) Patient Care, Safety, and Other Critical Vendors, (B) Lien Claimants and (C) 503(b)(9) Claimants, and (II) Granting Related Relief [Docket No. 9; filed February 5, 2024]
- 60. Motion of Debtors Pursuant to 11 U.S.C §§ 105(a), 363(b) and 541 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (A) Authorizing Debtors to (I) Maintain and Administer Prepetition Refund Programs, and (II) Pay and Honor Related Prepetition Obligations, and (B) Granting Related Relief [Docket No. 10; filed February 5, 2024]
- 61. Motion of Debtors Pursuant to 11 U.S.C §§ 105, 107, and 521 and Fed. R. Bankr. P. 1007, 2002, 9007, and 9018 for Entry of Order (I) Authorizing Debtors to Redact Certain Personal Identification Information; (II) Modifying Requirement to File Equity Security Holder List; (III) Approving Form and Manner of Notice of Commencement, Including Special Noticing Procedures

- for the Debtors' Current and Former Patients; and (IV) Granting Related Relief [Docket No. 12; filed February 5, 2024]
- 62. Motion of Debtors Pursuant to 11 U.S.C §§ 105(a), 107, and 521(a)(1) and Fed. R. Bankr. P. 1007, 9018, and 9037 for Entry of Order (I) Authorizing Implementation of Procedures to Protect Confidential Patient Information and (II) Granting Related Relief [Docket No. 11; filed February 5, 2024]
- 63. Debtors' Application Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. §§ 503 and 1107, and Fed. R. Bankr. P. 2002(f), for (I) Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent and (II) Granting Related Relief [Docket No. 13; filed February 5, 2024]

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the First Day Motions is scheduled for February 6, 2024 at 2:00 p.m. (Eastern Standard Time) before The Honorable Karen B. Owens, United States Bankruptcy Judge for the District of Delaware (the "First Day Hearing"). Parties who wish to participate in the First Day Hearing may do so by registering for the Zoom hearing at: (http://www.deb.uscourts.gov/ecourt-appearances).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

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Dated: February 5, 2024 Wilmington, Delaware

/s/ Amanda R. Steele

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