

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION
www.flmb.uscourts.gov

In re:	Chapter 11
CHS FL, LLC, <i>et al.</i> , ¹	Case No. 2:26-bk-01087-FMR
Debtors.	<i>Jointly Administered</i>
_____ /	
In re:	Chapter 11
Corizon Health of New Mexico, LLC,	Case No. 2:26-bk-01144-FMR
Debtor.	<i>Joint Administration Request Herein</i>
Tax I.D. No. Ending 4760	
_____ /	
In re:	Chapter 11
CHS Care NY, LLC	Case No. 2:26-bk-01145-FMR
Debtor.	<i>Joint Administration Request Herein</i>
Tax I.D. No. Ending 4573	
_____ /	
In re:	Chapter 11
CHS Care TX, LLC,	Case No. 2:26-bk-01146-FMR
Debtor.	<i>Joint Administration Request Herein</i>
Tax I.D. No. Ending 6583	
_____ /	

**DEBTORS' *EX PARTE*, EXPEDITED SUPPLEMENTAL MOTION FOR ENTRY OF AN
ORDER: (I) DIRECTING JOINT ADMINISTRATION OF ADDITIONAL
CHAPTER 11 CASES; AND (II) GRANTING RELATED RELIEF
REQUEST FOR EXPEDITED CONSIDERATION**

¹ The address of the Lead Debtor is 3347 Tamiami Trail E., Naples, FL 34112. The last four digits of the Debtors' federal tax identification numbers are: (i) CHS FL, LLC (5547); (ii) YesCare Corp. (5961) (iii) CHS TX, Inc. (5886); and (iv) CHS AL, LLC (0801).

The above-captioned debtors and debtors in possession (the “**Debtors**”) hereby move (the “**Motion**”), on an expedited and *ex parte* basis, for entry of an order (the “**Proposed Order**”), substantially in the form attached hereto as Exhibit A, pursuant to sections 105(a) and 342 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 1015-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Middle District of Florida (the “**Local Rules**”), (i) directing the joint administration of the additional three (3) chapter 11 cases with the lead case for procedural purposes only and (ii) granting related relief. In further support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over these cases pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Debtors confirm their consent to the entry of a final order or judgment by the Court in connection with this Motion if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and other predicates for the relief requested herein are Bankruptcy Code sections 105(a) and 342, Bankruptcy Rule 1015(b), and Local Rule 1015-1.

BACKGROUND

4. On May 8, 2026 (the “**Petition Date**”), CHS FL, LLC (Case No. 26-01087) and certain affiliates each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code

in the United States Bankruptcy Court for the Middle District of Florida, Fort Myers Division (the “**Court**”), commencing the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”).

5. Since the Petition Date, the Debtors continue to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

6. No trustee, examiner, or official committee of unsecured creditors has been appointed.

7. On May 8, 2026, the Court entered an order authorizing the joint administration of the Chapter 11 Cases (Docket No. 8) (“**Joint Administration Order**”). On May 13, 2026, the Debtors filed an additional three affiliated entities: CHS Care NY, LLC (Case No. 2:26-bk-01145-FMR), Corizon Healthcare of New Mexico, LLC (Case No. 2:26-bk-01144-FMR), and CHS Care TX, LLC (Case No. 2:26-bk-01146-FMR) (collectively, the “**May 13 Debtors**”).

8. Because each of the Debtors is a member of an affiliate group controlled by the same entity, each of the Debtors is an “affiliate” of the other Debtors as that term is defined under Bankruptcy Code section 101(2) and as used in Bankruptcy Rule 1015(b). The Debtors have interrelated liabilities and management, among other things.

RELIEF REQUESTED

9. By this Motion, the Debtors request entry of the Proposed Order, substantially in the form of Exhibit A, directing joint administration of the May 13 Debtors with the Chapter 11 Cases under the Joint Administration Order for procedural purposes only, pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1(A)(2)(a).

10. Specifically, the Debtors request that May 13 Debtors be jointly administered under the case of CHS FL, LLC, and that the May 13 Debtors be administered under a consolidated caption as follows:

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Jointly Administered

Debtors.

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¹ The address of the Lead Debtor is 3347 Tamiami Trl E. Naples, FL 34112. The last four digits of the Debtors' federal tax identification numbers are: (i) CHS FL, LLC (5547); (ii) CHS TX, Inc. (5886); (iii) CHS AL, LLC (0801); (iv) YesCare Corp. (5961); (v) CHS Care NY, LLC (4573); (vi) Corizon Health of New Mexico, LLC (4760); and (vii) CHS Care TX, LLC (6583).

11. The Debtors also respectfully request that a docket entry, substantially similar to the following, be entered on the docket of the May 13 Debtors to reflect the joint administration of these Chapter 11 Cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Bankruptcy Rules of the United States District Court for the Middle District of Florida, directing the procedural consolidation and joint administration of the Chapter 11 Cases of: CHS FL, LLC, CHS TX, LLC, YesCare Corp., CHS Care NY, LLC, Corizon Health of New Mexico, LLC, and CHS Care TX, LLC. The docket of CHS FL, LLC, Case No. 2:26-bk-01087-FMR should be consulted for all matters affecting these Chapter 11 Cases.

12. The Debtors further respectfully request that the Court order that the foregoing caption satisfies the requirements set forth under Bankruptcy Code section 342(c)(1) and Local Rule 9004-1(a).

13. Finally, the Debtors request that the Court permit the use of a combined service list and combined notices in these Chapter 11 Cases.

BASIS FOR RELIEF

14. Bankruptcy Rule 1015(b) provides that "if two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of

the estates.” Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” as that term is defined in Bankruptcy Code section 101(2). *See* 11 U.S.C. § 101(2). Moreover, Local Rule 1015-1 provides for the joint administration of related chapter 11 cases. *See* Local Rule 1015-1. Accordingly, the Bankruptcy Code, Bankruptcy Rules, and Local Rules empower the Court to grant the relief requested in this Motion.

15. Joint administration will promote efficiency and will ease the administrative burden on the Court and all parties in interest. Because the Debtors’ financial affairs and business operations are closely related, many of the motions, hearings, and orders in the bankruptcy proceedings will affect each of the Debtors. Joint administration will significantly reduce the volume of documents that otherwise would be filed with the Clerk of Court because it will avoid the preparation, replication, service, and filing, as applicable, of duplicative notices, applications, and orders. Joint administration will, therefore, render the completion of various administrative tasks less costly and will minimize the number of unnecessary delays. The relief requested by this Motion will also simplify supervision of the administrative aspects of these cases by the Office of the United States Trustee for the Middle District of Florida (the “**U.S. Trustee**”).

16. Further, joint administration of the May 13 Debtors with the Chapter 11 Cases will not prejudice or adversely impact the rights of the Debtors’ creditors because the relief sought herein is purely procedural and is not intended to affect substantive rights. Each creditor may still file a claim against individual estates, as applicable. Moreover, all creditors will benefit from the reduced costs that will result from the joint administration of the May 13 Debtors.

17. Giving the foregoing, joint administration of the May 13 Debtors will not give rise to any conflict of interest among the estates and will allow for a more cost-effective and streamlined process throughout these Chapter 11 Cases.

18. For these reasons, the Debtors respectfully submit that the relief requested herein is in the best interest of the estates and will reduce administrative burdens on the Court and all parties in interest, and, therefore, should be granted.

NO PRIOR REQUEST

19. No previous request for the relief sought herein has been made by the May 13 Debtors to this Court or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as Exhibit A, granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: May 15, 2026

Respectfully submitted,

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Proposed Counsel to Debtors and Debtors in Possession

Exhibit A

Proposed Order

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**ORDER GRANTING DEBTORS' EXPEDITED, *EX PARTE* MOTION REQUESTING
ENTRY OF AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

¹ The address of the Lead Debtor is 3347 Tamiami Trail E., Naples, FL 34112. The last four digits of the Debtors' federal tax identification numbers are: (i) CHS FL, LLC (5547); (ii) YesCare Corp. (5961) (iii) CHS TX, Inc. (5886); and (iv) CHS AL, LLC (0801).

THIS CASE came on for consideration without hearing upon the *Debtors' Expedited, Ex Parte Supplemental Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* (the “**Motion**”).² This Court, having considered the Motion and the First Day Declaration, finding that (a) this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the Constitution; (c) venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; (d) notice of the Motion and the hearing thereon was sufficient under the circumstances; (e) the relief requested in the Motion is in the best interests of the Debtors' estate, their creditors, and other parties in interest; (f) all objections, if any, to the Motion have been withdrawn, resolved or overruled, or, alternatively, the movant by submitting this form of order having represented that the motion was served on all interested parties required to be served, that the response time provided by that rule has expired, that no one has filed, or served on the movant, a response to the Motion, and that the form of order was attached as an exhibit to the Motion; and (g) this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein, it is

ORDERED:

1. The relief requested in the Motion is GRANTED as set forth herein.
2. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise affecting the substantive consolidation of any of the Chapter 11 Cases, the Debtors, or the Debtors' estates
3. All pleadings in the Chapter 11 cases shall bear a consolidated caption as follows:

² All capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

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4. The foregoing caption satisfies the requirements of Bankruptcy Code section 342(c)(1) and Local Rule 9004-1(a).

5. A docket entry shall be made in each of the May 13 Debtor cases substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Bankruptcy Rules of the United States District Court for the Middle District of Florida, directing the procedural consolidation and joint administration of the Chapter 11 Cases of: CHS FL, LLC, CHS TX, LLC, YesCare Corp., CHS Care NY, LLC, Corizon Health of New Mexico, LLC, and CHS Care TX, LLC. The docket of CHS FL, LLC, Case No. 2:26-bk-01087-FMR should be consulted for all matters affecting these Chapter 11 Cases.

6. The Clerk of Court shall maintain one file and one docket for the Debtors' jointly administered chapter 11 cases, which file and docket shall be the file and docket for the chapter 11 case of CHS FL, LLC, Case No. 2:26-bk-01087-FMR.

7. The Debtors shall file individual monthly operating reports in each of the above-captioned cases in the ordinary course of these cases.

8. The requirements of Bankruptcy Code section 342(c)(1) and Bankruptcy Rule 2002(n) are hereby satisfied.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Attorney Christian Garrett Haman, or the Debtors' proposed noticing agent Omni Agent Solutions, Inc., is directed to serve a copy of this Order on interested parties who do not receive service by CM/ECF and file a proof of service within three (3) days of entry of the order.