

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

In re: Chapter 11
CHS FL, LLC, *et al.*,¹ Case No. 2:26-bk-01087-FMR
Debtors. *Jointly Administered*
_____ /

In re: Chapter 11
Corizon Health of New Mexico, LLC, Case No. 2:26-bk-01144-FMR
Debtor. *Joint Administration Request Pending*

Tax I.D. No. Ending 4760
_____ /

In re: Chapter 11
CHS Care NY, LLC Case No. 2:26-bk-01145-FMR
Debtor. *Joint Administration Request Pending*

Tax I.D. No. Ending 4573
_____ /

In re: Chapter 11
CHS Care TX, LLC, Case No. 2:26-bk-01146-FMR
Debtor. *Joint Administration Request Pending*

Tax I.D. No. Ending 6583
_____ /

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).

**DEBTORS' EXPEDITED MOTION FOR ENTRY
OF AN ORDER ESTABLISHING BAR DATE**

REQUEST FOR EXPEDITED CONSIDERATION

The above-captioned debtors and debtors in possession (the “Debtors”) in the above-captioned Chapter 11 cases (the “Chapter 11 Cases”) hereby move this Court (this “Motion”) for entry of an order (the “Order”), substantially in the form attached hereto as Exhibit A, establishing deadlines for filing proofs of claim. In support of the Motion, the Debtors, by and through their undersigned counsel, respectfully represent as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334.

2. 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. These cases were appropriately filed in Fort Myers Division pursuant to Local Rule 1071-1(c).

3. Venue of these Chapter 11 Cases and the Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

4. The statutory predicates for the relief sought herein are section 105(a) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2002, 3001, 3003, and 9008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9013-1(e) of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida (the “Local Rules”).

RELIEF REQUESTED

5. The Debtors respectfully request entry of the Order establishing the following deadlines (collectively, the Bar Dates) for filing proofs of claim (Proofs of Claim) in these Chapter 11 cases:²

- a. 5:00 p.m. (prevailing Eastern Time) on the date that is 100 days from the completion of service of the (i) notice of commencement and (ii) proof of claim form (collectively, the Bar Date Notice Package) approved by the Court, which will occur promptly following the later of entry of the Order and the filing of the Schedules and Statements (the Service Date), as the date by which all persons or other entities holding prepetition claims against any of the Debtors must file a Proof of Claim on account of such claims (the General Bar Date), including claims for rights to payment arising on account of any federal or state statutory trusts, secured claims, unsecured priority claims (e.g., claims entitled to priority under sections 503(b)(9) and 507(a)(4), (5), and (8) of the Bankruptcy Code), and unsecured non-priority claims, unless they are subject to a different Bar Date; *provided*, that the Debtors, in consultation any committee of unsecured creditors appointed in these Chapter 11 Cases (the Committee), are authorized (but not required) to agree in writing (email being sufficient), without further order of this Court, to extend the General Bar Date on behalf of a requesting claimant;
- b. **5:00 p.m. (prevailing Eastern Time) on Wednesday, November 4, 2026** as the date by which all governmental units holding prepetition claims against any of the Debtors must file a Proof of Claim on account of such claims (unless they are subject to an Exception) in these chapter 11 cases (the Governmental Bar Date);
- c. if, on or after the Service Date, a Debtor amends its schedules of assets and liabilities (the Schedules) to (A) reduce the undisputed, noncontingent, and liquidated amount of any claim listed therein, (B) change the amount, nature, or classification of a claim against the Debtor reflected in its Schedules, or (C) remove a claim from its Schedules, each affected creditor would have the opportunity to file a Proof of Claim, or amend any previously-filed Proof of Claim, in respect of the amended or removed scheduled claim **up until the later of (Y) the General Bar Date or the Governmental Bar Date, as applicable, and (Z) 5:00 p.m. (prevailing Eastern Time) on the date that is 30 days from the date on which Debtor provides notice of such amendment to the affected creditor** (together, the Amended Schedules Bar Date); and

² The terms “claim,” “entity,” “governmental unit,” and “person” shall have the meanings ascribed to such terms in the Bankruptcy Code.

- d. except as set forth in any Court order authorizing the rejection of an executory contract or unexpired lease, the deadline to file a Proof of Claim on account of a Debtor's rejection of an executory contract or unexpired lease shall be **the later of (A) the General Bar Date or the Governmental Bar Date, as applicable, and (B) 5:00 p.m. (prevailing Eastern Time) on the date that is 30 days from the date that the Debtors provide notice of the Court's entry of an order authorizing such rejection to the affected contract or lease counterparty** (together, the "Rejection Damages Bar Date");

BACKGROUND

6. On May 8, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition in this Court commencing the Chapter 11 Cases.

7. On May 8, 2026, three of the Debtors—CHS FL, LLC, YesCare Corp., CHS TX, Inc., and CHS AL, LLC (collectively, the "May 8 Debtors")—each filed a voluntary petition in the Court, commencing their respective cases (collectively, the "May 8 Cases"). On that date, the Court entered its Order Granting Debtors' Expedited Ex Parte Motion for Entry of an Order: (I) Directing Joint Administration of Chapter 11 Cases; and (II) Granting Related Relief ("Joint Administration Order") (Doc. No. 8), jointly administering the May 8 Cases. The Debtors will seek joint administration of the remaining three cases that were commenced on May 13, 2026.

8. The Debtors continue to manage and operate their business as debtors in possession pursuant to Bankruptcy Code sections 1107 and 1108.

9. No trustee or examiner has been requested in these Chapter 11 Cases and no committees have yet been appointed.

10. The factual background regarding the Debtors and the events leading to the filing of these Chapter 11 Cases is set forth in the *Declaration of David Goldwasser in Support of the Debtors' Chapter 11 Petitions and First Day Relief* (Doc. No. 25), filed on May 10, 2026 and incorporated herein by reference.

11. Contemporaneously herewith, the Debtors have filed or will file a motion seeking

approval of the form of a notice of commencement, proof of claim form, and publication notice for any potential unknown creditors.

THE PROPOSED BAR DATES

12. Bankruptcy Rule 3003(c)(3) generally governs the filing of proofs of claim in a chapter 11 case and provides, in relevant part, that “[t]he court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed,” Fed. R. Bankr. P. 3003(c)(3). The time by which proofs of claim must be filed in these Chapter 11 Cases is not set forth in the Bankruptcy Code, the Bankruptcy Rules, or the Bankruptcy Local Rules.

13. Bankruptcy Rule 2002(a) provides that creditors are entitled to at least twenty-one (21) days’ notice of the time fixed for filing proofs of claim under Bankruptcy Rule 3003, and Bankruptcy Rule 2002(p) provides that a creditor with a foreign address is entitled to at least thirty (30) days’ notice of such deadline.

A. The General Bar Date

14. The General Bar Date will be the deadline by which each person or entity, other than a Governmental Unit, must file a proof of claim in respect of any prepetition claim against any of the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim, claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days of the Petition Date, except as otherwise provided in this Motion.

15. The Debtors propose an extended General Bar Date of one hundred (100) days from the Service Date to ensure that current or former patients of the Debtors, who may be difficult to reach due to incarceration, may timely file a Proof of Claim. *See, e.g. In re Wellpath Holdings, Inc.*, Case No. 24-90533 at Docket No. 491 (Bankr. S.D. Tex. December 18, 2024) (establishing a

general bar date of 100 days from service of the notice of bar date). In addition to the extended General Bar Date, the Debtors seek authority to agree in writing (email being sufficient), without further order of this Court, to extend the General Bar Date on behalf of a requesting claimant. Such language is memorialized in the Order, and permits claimants who miss the General Bar Date to request and obtain an extension of the same from the Debtors without further leave of the Court.

16. The Debtors submit that the extended General Bar Date and ability to obtain an extension of the same without further leave of the Court will permit current and former patients as well as other claimants subject to the General Bar Date to timely file Proofs of Claim.

B. The Governmental Bar Date

17. Section 502(b)(9) of the Bankruptcy Code provides, in relevant part, that “a claim of a governmental unit shall be timely filed if it is filed before one hundred eighty (180) days after the date of the order for relief or such later time as the Federal Rules of Bankruptcy Procedure may provide.”

18. The Debtors request that the Court establish November 4, 2026 as the Government Bar Date. The Government Bar Date will be the deadline by which any Governmental Unit must file a proof of claim in respect of any prepetition claim against any of the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim, or any claim for unpaid taxes. As November 4, 2026 is the first business day at least one hundred eighty (180) days after the Petition Date, the proposed Government Bar Date complies with section 502(b)(9) of the Bankruptcy Code.

C. The Rejection Bar Date

19. The Debtors request that the Court establish the later of (i) the General Bar Date or the Government Bar Date (as applicable) and (ii) 5:00 p.m. prevailing Eastern Time on the date

that is thirty (30) days after the date of the entry of an order approving rejection of an executory contract or unexpired lease of the Debtors as the Rejection Bar Date. The Rejection Bar Date will apply to any entity asserting a claim against any of the Debtors arising from rejection of an executory contract or unexpired lease. As noted above, the Rejection Bar Date complies with Bankruptcy Rules 2002, 3002(c)(4), and 3003(c)(3) because it provides over thirty (30) days' notice to potential claimants, which is more than is required by the Bankruptcy Rules.

D. The Amended Schedule Bar Date

20. The Debtors request that the Court establish the later of (i) the General Bar Date or the Government Bar Date (as applicable) and (ii) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days following service of notice of an amendment to the Debtors' Schedules as the Amended Schedule Bar Date. The Amended Schedule Bar Date will apply to any entity whose claim is affected by an amendment to the Schedules. In particular, an entity whose claim is added or removed from the Schedules, changed in respect of amount or priority, or designated as contingent, unliquidated, or disputed when it previously was not so designated, shall be given notice of the Amended Schedule Bar Date and shall be required (to the extent necessary to dispute any such amendment) to file, amend, or supplement a proof of claim by such date. As noted above, the Amended Schedule Bar Date complies with Bankruptcy Rules 2002 and 3003(c)(3) because it provides thirty (30) days' notice to potential claimants. An amendment to the Schedules to include any intercompany amount owed between the Debtor entities shall not extend the General Bar Date.

BASIS FOR RELIEF

21. As discussed above, Bankruptcy Rule 3003(c)(3) requires the bankruptcy court to fix the time within which proofs of claim may be filed in a chapter 11 case. Fed. R. Bankr. P. 3003(c)(3) ("The court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed."). Likewise, section 503(a) of the Bankruptcy Code contemplates

that the bankruptcy court will fix a deadline for filing administrative expense claims because it requires that such claims be “timely.” 11 U.S.C. § 503(a) (“An entity may timely file a request for payment of an administrative expense, or may tardily file such request if permitted by the court for cause.”).

22. Moreover, establishing claims bar dates enables a debtor and parties in interest to ascertain and evaluate the debtor’s liabilities and, with that information, proceed to a chapter 11 plan or other disposition. *See Chemetron Corp. v. Jones*, 72 F.3d 341, 346 (3d Cir. 1995) (noting that establishing a bar date advances one of the key goals of a bankruptcy, “to secure within a limited period the prompt and effectual administration and settlement of the debtor’s estate”). Without a bar date, the debtor may not be able to formulate a disclosure statement or proceed with a plan because, among other reasons, it may not be able to determine the treatment of creditors without knowing with certainty the quantum of claims. Indeed, courts typically require that a disclosure statement discuss the amount and nature of claims against the debtor. Similarly, without knowing the quantum of administrative or priority claims against its estate, a debtor may not be able to demonstrate that a plan is feasible, as such claims typically need to be paid when the plan goes effective. For these reasons, establishing the Bar Dates in these cases is essential to the Debtors’ efforts to pursue a chapter 11 plan or other disposition of these Chapter 11 Cases.

23. Further, the proposed Bar Dates comply with the applicable requirements of the Bankruptcy Code and Bankruptcy Rules, while affording the Debtors additional time to provide notice to incarcerated patients.

24. For the foregoing reasons, the Debtors submit that the Bar Dates are consistent with the Bankruptcy Code, Bankruptcy Rules, and applicable law, and should therefore be approved.

WHEREFORE, the Debtors respectfully request that the Court hear this Motion on an expedited basis and enter an order in the form attached hereto as Exhibit A³, (i) granting the relief requested in this Motion; and (ii) granting such other relief as the Court deems just and proper.

Dated: May 15, 2026

Respectfully submitted,

POLSINELLI PC
600 Third Avenue
42nd Floor
New York, NY 10016
Telephone: (646) 289-6507

DAL LAGO LAW
999 Vanderbilt Beach Road
Suite 200
Naples, FL 34108
Telephone: (239) 571-6877

By: /s/ Jeremy R. Johnson
JEREMY R. JOHNSON (admitted *pro hac vice*)
New York Bar No. 4307617
Email: jeremy.johnson@polsinelli.com

By: /s/ Christian Garrett Haman
Michael R. Dal Lago
Florida Bar No. 102185
Email: mike@dallagolaw.com
CHRISTIAN GARRETT HAMAN
Florida Bar No. 1017079
Email: chaman@dallagolaw.com

4020 Maple Ave., Suite 300
Dallas, TX 75219

By: /s/ Trinitee G. Green
TRINITEE G. GREEN (admitted *pro hac vice*)
Texas Bar No. 24081320
Email: tggreen@polsinelli.com

Filer's Attestation: Pursuant to Local Rule 1001-2(g)(3) regarding signatures, Christian Garrett Haman attests that concurrence in the filing of this paper has been obtained.

Proposed Counsel for the Debtors and Debtors-in-Possession

Proposed Local Counsel to the Debtors and Debtors in Possession

³ This proposed order assumes all of the Chapter 11 Cases, including those commenced on May 8 and May 13, 2026, will be jointly administered.

EXHIBIT A

Proposed Order

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

In re:

Chapter 11

CHS FL, LLC, *et al.*,¹

Case No. 2:26-bk-01087-FMR

Jointly Administered

Debtors.

**ORDER GRANTING DEBTORS' EXPEDITED
MOTION FOR ORDER ESTABLISHING BAR DATES**
(Related Doc. No. ____)

THIS CASE came on for hearing ____ __, 2026 at __:__.m. upon consideration of the motion (the "Motion")² of the Debtors for entry of an order (this "Order") establishing certain bar dates for filing prepetition claims in these Chapter 11 Cases; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of these chapter 11 cases and related proceedings being

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); (iv) CHS AL, LLC (0801); (v) Corizon Health of New Mexico, LLC (4760); (vi) CHS Care NY, LLC (4573); and (vii) CHS Care TX, LLC (6583).

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

proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the Notice Parties, such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed and considered the Motion; and this Court having held a hearing to consider the relief requested in the Motion (the “**Hearing**”); and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause exists to grant the relief requested; therefore it is

ORDERED:

1. The Motion is **GRANTED** as set forth herein.
2. Unless otherwise provided herein, the following Bar Dates are hereby established in these Chapter 11 Cases:
 - a. 5:00 p.m. (prevailing Eastern Time) on the date that is 100 days from the completion of service of the (i) notice of commencement and (ii) proof of claim form (collectively, the “Bar Date Notice Package”) approved by the Court, which will occur promptly following the later of entry of the Order and the filing of the Schedules and Statements (the “Service Date”), as the date by which all persons or other entities holding prepetition claims against any of the Debtors must file a Proof of Claim on account of such claims (the “General Bar Date”), including claims for rights to payment arising on account of any federal or state statutory trusts, secured claims, unsecured priority claims (e.g., claims entitled to priority under sections 503(b)(9) and 507(a)(4), (5), and (8) of the Bankruptcy Code), and unsecured non-priority claims, unless they are subject to a different Bar Date;
 - b. **5:00 p.m. (prevailing Eastern Time) on Wednesday, November 4, 2026³** as the date by which all governmental units holding prepetition claims against any of the Debtors must file a Proof of Claim on account of such

³ NTD: this is 180 days after the petition date.

claims (unless they are subject to an Exception) in these chapter 11 cases (the “Governmental Bar Date”);

- c. if, on or after the Service Date, a Debtor amends its schedules of assets and liabilities (the “Schedules”) to (A) reduce the undisputed, noncontingent, and liquidated amount of any claim listed therein, (B) change the amount, nature, or classification of a claim against the Debtor reflected in its Schedules, or (C) remove a claim from its Schedules, each affected creditor would have the opportunity to file a Proof of Claim, or amend any previously-filed Proof of Claim, in respect of the amended or removed scheduled claim **up until the later of (Y) the General Bar Date or the Governmental Bar Date, as applicable, and (Z) 5:00 p.m. (prevailing Eastern Time) on the date that is 30 days from the date on which Debtor provides notice of such amendment to the affected creditor (together, the “Amended Schedules Bar Date”);** and
- d. except as set forth in any Court order authorizing the rejection of an executory contract or unexpired lease, the deadline to file a Proof of Claim on account of a Debtor’s rejection of an executory contract or unexpired lease shall be **the later of (A) the General Bar Date or the Governmental Bar Date, as applicable, and (B) 5:00 p.m. (prevailing Eastern Time) on the date that is 30 days from the date that the Debtors provide notice of the Court’s entry of an order authorizing such rejection to the affected contract or lease counterparty** (together, the “Rejection Damages Bar Date”).

3. Notwithstanding the foregoing, the Debtors, in consultation any committee of unsecured creditors appointed in these Chapter 11 Cases (the “Committee”), are authorized (but not required) to agree in writing (email being sufficient), without further order of this Court, to extend the General Bar Date on behalf of a requesting claimant.

4. Absent further order of the Court to the contrary, and subject to paragraph 3 above, any entity who is required (and not exempt) under this Bar Date Order, but fails, to submit a proof of claim in accordance with this Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors and their property, shall be forever enjoined from asserting claims for any and all indebtedness or liability with respect to or arising from such claim in these Chapter 11 Cases. Without limiting the foregoing sentence, any creditor asserting a claim entitled to priority pursuant to section 503(b)(9)

of the Bankruptcy Code that fails to file a proof of claim in accordance with this Bar Date Order shall not be entitled to any priority treatment on account of such claim pursuant to section 503(b)(9) of the Bankruptcy Code, regardless of whether such claim is identified on the Schedules as not contingent, not disputed, and not liquidated.

5. The Debtors are authorized to take any action necessary or appropriate to implement and effectuate the terms of, and the relief granted in, this Order without seeking further order of this Court.

6. This Court retains exclusive jurisdiction over any matter arising from or related to the implementation, interpretation, and enforcement of this Order.

Attorney Michael R. Dal Lago, through the Debtors' proposed noticing agent, is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and to file a proof of service within three days of entry of the order.