

BARNES & THORNBURG LLP
Ali M. M. Mojdehi, Bar No. 123846
amojdehi@btlaw.com
Allison M. Rego, Bar No. 272840
arego@btlaw.com
655 West Broadway, Suite 1300
San Diego, California 92101
Telephone: (619) 321-5000
Facsimile: (310) 284-3894

Attorneys for Creditors
DRP Holdings, LLC, Inland Valley
Investments, LLC, Premier Healthcare
Management, Inc., and
Promenade Square, LLC

**PACHULSKI STANG ZIEHL &
JONES LLP**

Jeffrey N. Pomerantz (Bar No. 143717)
Steven W. Golden (Pro Hac Vice)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: 310-277-6910
Facsimile: 310-201-0760
Email: jpomerantz@pszjlaw.com
sgolden@pszjlaw.com

Attorneys to the Official Committee of
Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

In re

**BORREGO COMMUNITY
HEALTH FOUNDATION,**

Debtor and Debtor in
Possession.

DENTONS US LLP
SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
REBECCA M. WICKS (Bar No. 313608)
rebecca.wicks@dentons.com
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Telephone: 213 623-9300
Facsimile: 213 623-9924

Attorneys for the Chapter 11 Debtor and
Debtor in Possession

Case No. 22-02384-11

Chapter 11 Case
Honorable Laura S. Taylor

**STIPULATION BY AND AMONG THE
DEBTOR, THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS AND CREDITORS DRP
HOLDINGS, LLC, INLAND VALLEY
INVESTMENTS, LLC, PREMIER
HEALTHCARE MANAGEMENT, INC.,
AND PROMENADE SQUARE, LLC FOR
EXTENSION OF TIME**



1 This Stipulation is entered into by and among Borrego Community Health
2 Foundation, the debtor and debtor in possession (the “Debtor”) in the above-
3 captioned chapter 11 bankruptcy case, the Official Committee of Unsecured
4 Creditors (the “Committee”), and Creditors DRP Holdings, LLC (“DRP”), Inland
5 Valley Investments, LLC (“IVI”), Premier Healthcare Management, Inc.
6 (“Premier”), and Promenade Square, LLC (“Promenade”, and collectively with DRP,
7 IVI and Premier, the “Creditors”), collectively the Debtor, the Committee and the
8 Creditors are referred to herein as the “Parties”.

9 **RECITALS**

10 1. The Parties have agreed in principle to certain matters relating to
11 reserving for the full amounts of the claims asserted by the Creditors and other
12 matters related to the *First Amended Joint Combined Disclosure Statement and*
13 *Chapter 11 Plan of Liquidation* (Doc. 1168, and as may be subsequently amended,
14 the “Plan”).

15 2. In order to afford the Parties additional time to memorialize their
16 agreement, the Parties have agreed to extend the Creditors’ deadlines relating to
17 objections and voting on the Plan.

18 **STIPULATION**

19 NOW THEREFORE, subject to approval of the Court, the Parties hereby agree
20 and stipulate as follows:

21 1. The Voting Deadline (as defined in paragraph 13 the Order granting the
22 Debtor’s and Committee’s Joint Motion, entered at Docket No. 1179, the “Order”)
23 shall be extended from January 8, 2024 at 4:00 (Pacific) to January 10, 2024 at 4:00
24 (Pacific).

25 2. The deadline for the Creditors to file and serve objections to the Plan
26 pursuant to paragraph 14 of the Order shall be extended from January 8, 2024 at 4:00
27 (Pacific) to January 10, 2024 at 4:00 (Pacific).
28

1 3. The deadline for the Debtors and the Committee to file and serve a reply
2 to any objection shall be extended to January 15, 2024.

3 4. The Court shall retain jurisdiction over all matters relating to the
4 interpretation and enforcement of this Stipulation.

5 Respectfully submitted,

6
7 Dated: January 8, 2024

BARNES & THORNBURG LLP

8
9 By: /s/Ali M. M. Mojdehi
10 Ali M. M. Mojdehi
11 Allison M. Rego

12 Attorneys for Creditors DRP Holdings,
13 LLC, Inland Valley Investments, LLC,
14 Premier Healthcare Management, Inc., and
15 Promenade Square, LLC

16
17 Dated: January 8, 2024

DENTONS US LLP
18 SAMUEL R. MAIZEL
19 TANIA M. MOYRON

20 By: /s/Tania M. Moyron
21 Tania M. Moyron

22 Attorneys for the Chapter 11 Debtor and
23 Debtor in Possession

24
25 Dated: January 8, 2024

**PACHULSKI STANG ZIEHL &
26 JONES LLP**
27 Jeffrey N. Pomerantz
28 Steven W. Golden

By: /s/Steven W. Golden
Steven W. Golden

Attorneys for the Official Committee of
Unsecured Creditors

CERTIFICATE OF SERVICE

I, Ali M. M. Mojdehi, hereby certify that the foregoing was filed and served via the CM/ECF System.

Dated: January 8, 2024 /s/Ali M. M. Mojdehi