Docket #1640 Date Filed: 08/07/2020

JAMES L. DAY (WSBA #20474) HONORABLE WHITMAN L. HOLT 1 THOMAS A. BUFORD (WSBA #52969) BUSH KORNFELD LLP 2 601 Union Street, Suite 5000 Seattle, WA 98101 Tel: (206) 292-2110 3 Email: jday@bskd.com tbuford@bskd.com 4 SAMUEL R. MAIZEL (Admitted *Pro Hac Vice*) DENTONS US LLP 601 South Figueroa Street, Suite 2500 5 Los Angeles, California 90017-5704 Tel: (213) 623-9300 Fax: (213) 623-9924 6 Email: samuel.maizel@dentons.com 7 SAM J. ALBERTS (WSBA #22255) DENTONS US LLP 1900 K. Street, NW 8 Washington, DC 20006 Tel: (202) 496-7500 Fax: (202) 496-7756 9 Email: sam.alberts@dentons.com Attorneys for the Chapter 11 Debtors 10 and Debtors In Possession UNITED STATES BANKRUPTCY COURT 11 EASTERN DISTRICT OF WASHINGTON 12 In re: Chapter 11 13 ASTRIA HEALTH, et al., Lead Case No. 19-01189-11 14 Debtors and Debtors in Jointly Administered Possession.¹ STIPULATION CONTINUING 15 DISCLOSURE STATEMENT HEARING AND DEADLINE TO 16 FILE REPLIES TO OBJECTIONS 17 18 ¹ The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11), Glacier Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11), Oxbow Summit, LLC (19-01195-11), SHC Holdco, LLC (19-01196-11), SHC Medical Center - Toppenish (19-19 01190-11), SHC Medical Center - Yakima (19-01192-11), Sunnyside Community Hospital Association (19-01191-11), Sunnyside Community Hospital Home Medical Supply, LLC (19-01197-11), Sunnyside Home Health (19-01198-11), Sunnyside Professional Services, LLC (19-20 01199-11), Yakima Home Care Holdings, LLC (19-01201-11), and Yakima HMA Home Health, LLC (19-01200-11). 21 DENTONS US LLP BUSH KORNFELD 1 STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING 1 1901189200807000000000007

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1		[RELATED TO DOCKET NOS. 1472, 1473]
2		CONTINUED HEARING: Date/Time: August 19, 2020/11:00 am
3		(Pacific) Location: Telephonic or in person at:
4		U.S. Bankruptcy Court, 402 E. Yakima Avenue, Second Floor Courtroom
5		Yakima, WA 98901
6		Telephone Conference: (877) 402-9757 Access Code: 7036041
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21	STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING	DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, CA 90017-5704 BUSH KORNFELD LAW OFFICES 601 Union St., Suite 5000

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STIPULATION

This stipulation (the "Stipulation") is entered into between Astria Health
("Astria"), a Washington nonprofit corporation, along with the above-referenced
affiliated debtors (collectively, the "Debtors"), the debtors and debtors in possession
in the above-captioned chapter 11 bankruptcy cases (collectively, the "Chapter 11
Cases"), Lapis Advisers, L.P. ("Lapis"), UMB Bank, N.A. as trustee ("UMB Bank"),
and the United States Trustee (the "U.S. Trustee," and together with the Debtors,
Lapis, and UMB Bank, the "Parties").

RECITALS

- 1. On July 7, 2020, Lapis, UMB and the Debtors (the "Plan Proponents") filed the Joint 11 Chapter Plan of Reorganization of Astria Health and its Debtor Affiliates [Docket No. 1471] (the "Plan") as well as the Disclosure Statement Relating to the Joint Chapter 11 Plan of Reorganization of Astria Health and its Debtor Affiliates [Docket No. 1472] (the "Disclosure Statement").
- 2. The Plan Proponents also filed a Notice of Hearing and Joint Motion for an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting Procedures; (III) Notice and Objection Procedures for Confirmation of Joint Plan of Reorganization; and (IV) Granting Related Relief; Memorandum of Points and Authorities in Support Thereof [Docket No. 1473], setting a hearing to consider the Disclosure Statement for August 13, 2020, at 11:00 a.m. (the "Disclosure Statement"

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STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, CA 90017-5704 Phone: (213) 623-9300

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1	Hearing") and August 7, 2020 as the deadline to file relies to any objections to the			
2	Disclosure Statement (the "Reply Deadline").			
3	3. The Plan Proponents only received two objections to the Disclosure			
4	Statement: one filed by the Official Committee of Unsecured Creditors (the			
5	"Committee") [Docket No. 1624] and the other filed by the U.S. Trustee [Docket No.			
6	1626]. ²			
7	4. On July 28, 2020, the Committee also served certain requests for			
8	production of documents on the Debtors, Lapis and UMB Bank which relate to the			
9	filed Plan and Disclosure Statement (the "Discovery Requests"). The deadline to			
10	respond to these Discovery Requests is August 18, 2020.			
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14	TIAA Commercial Finance, Inc. filed the Objection and Joinder of TIAA			
15	Commercial Finance, Inc. with Respect to the Debtors' Joint Motion for an Order			
16	Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting			
17	Procedures; (III) Notice and Objection Procedures for Confirmation of Joint Plan of			
18	Reorganization; and (IV) Granting Related Relief [Docket No. 1625], which merely			
19	joined the objections of other creditors to the Disclosure Statement and reserved the			
20	right to supplement those objections.			
21	DENTONS US LLP BUSH KORNFELD 601 South Figueroa Street, Suite 2500 LAW OFFICES	LI		

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STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING

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1	5. The Parties have agreed to continue the Reply Deadline to August 17,	;			
2	2020, at 12:00 p.m. and the Disclosure Statement Hearing to August 19, 2020, at				
3	11:00 a.m.				
4	6. At this time, formal approval of the Stipulation has not have been				
5	obtained from the Committee. Nevertheless, counsel to the Committee orally agreed				
6	to (a) extend the Reply Deadline to August 17, 2020, at 12:00 p.m., (b) extend the				
7	deadline for Lapis and UMB Bank to respond to its Discovery Requests to August				
8	25, 2020, and (c) continue the Disclosure Statement Hearing to August 19, 2020, at				
9	11:00 a.m.				
10	AGREEMENT	;			
11	NOW THEREFORE, the Parties to this Stipulation hereby agree and				
12	stipulate as follows:				
13	A. The Reply Deadline is extended from August 7, 2020 to August 17,				
14	2020, at 12:00 p.m.				
15	B. The Disclosure Statement Hearing is continued from August 13, 2020,				
16	at 11:00 a.m. to August 19, 2020, at 11:00 a.m.				
17	C. The deadline for the Debtors, Lapis and UMB Bank to respond to the				
18	Committee's Discovery Requests is extended from August 18, 2020 to August 25,				
19	2020.				
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21	DENTONS US LLP 601 South Figueroa Street, Suite 2500 STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING DISCLOSURE STATEMENT SACTIVE\(^{115273635\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	00 -237 10			
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1	Presented by:		
2	Astria Health, et al.		
3	By: /s/ Sam R. Maizel Samuel R. Maizel		
4	Sam J. Alberts DENTONS US LLP		
5	AND		
6			
7	James L. Day Thomas A. Buford BUSH KORNFELD LLP		
8	Counsel to Debtors and Debtors In Possession	on	
9	Lapis Advisers, L.P.		
10	By: <u>/s/ Ryan T. Jareck</u> Michael Sirota		
11	Ryan T. Jareck COLE SCHOTZ P.C.		
12	Counsel to Lapis Advisers, L.P.		
13	UMB Bank, N.A., as trustee and Lapis Advisers, L.P., as agent		
14	By: /s/ William W. Kannel		
15	William W. Kannel (pro hac vice) Ian A. Hammel (pro hac vice)		
16	Timothy J. McKeon (pro hac vice)	D.C.	
17	Mintz Levin Cohn Ferris Glovsky & Popeo, Counsel for UMB Bank, N.A., as trustee	r.C.	
18	and Lapis Advisers, L.P., as agent		
19			
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21		DENTONS US LLP 501 South Figueroa Street, Suite 2500	BUSH KORNFELD LI
	STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING 6	Los Angeles, CA 90017-5704 Phone: (213) 623-9300 Fax: (213) 623-9924	601 Union St., Suite 5000 Seattle, Washington 98101-237 Telephone (206) 292-2110 Facsimile (206) 292-2104

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1	Office of the United States Trustee			
2	By: /s/ Gary W. Dyer Gary W. Dyer			
3	Assistant United States Trustee United States Department of Justice			
4	Officed States Department of Justice			
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21	STIPULATION CONTINUING DISCLOSURE STATEMENT HEARING	7	01 South Figueroa Street, Suite 2500 Los Angeles, CA 90017-5704 Phone: (213) 623-9300 Fax: (213) 623-9924	LAW OFFICES 601 Union St., Suite 5000 Seattle, Washington 98101-23' Telephone (206) 292-2110 Facsimile (206) 292-2104

HEARING

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