

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

JAMES L. DAY (WSBA #20474)
THOMAS A. BUFORD (WSBA #52969)
BUSH KORNFELD LLP
601 Union Street, Suite 5000
Seattle, WA 98101
Tel: (206) 292-2110
Email: jday@bskd.com
tbuford@bskd.com

HONORABLE WHITMAN L. HOLT

SAMUEL R. MAIZEL (Admitted *Pro Hac Vice*)
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Tel: (213) 623-9300
Fax: (213) 623-9924
Email: samuel.maizel@dentons.com

SAM J. ALBERTS (WSBA #22255)
DENTONS US LLP
1900 K. Street, NW
Washington, DC 20006
Tel: (202) 496-7500
Fax: (202) 496-7756
Email: sam.alberts@dentons.com

*Attorneys for the Chapter 11 Debtors
and Debtors In Possession*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

ASTRIA HEALTH, et al.,

Debtors and Debtors in
Possession.¹

Chapter 11
Lead Case No. 19-01189-11
Jointly Administered
**STIPULATION CONTINUING AHM,
INC.'S VOTING DEADLINE AND
DEADLINE TO OBJECT TO JOINT PLAN**
**[Related Docket Nos. 1986, 1987, 2076, 2095,
2116, 2119, 2125, 2126]**

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 (19-01190-11), 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 (19-01199-11), Yakima Home Care Holdings, LLC (19-01201-11), and Yakima HMA Home Health, LLC (19-01200-11).

STIPULATION

DENTONS US LLP BUSH KORNFELD LLP
601 South Figueroa Street, Suite 2500

Fax: 19011892012150000000000005 2110
Facsimile (206) 292-2104

1 **STIPULATION**

2 This stipulation (the "Stipulation") is entered into between Astria Health
3 ("Astria"), a Washington nonprofit corporation, along with the above-referenced
4 affiliated debtors (collectively, the "Debtors"), the debtors and debtors in possession
5 in the above-captioned chapter 11 bankruptcy cases (collectively, the "Chapter 11
6 Cases"), and AHM, Inc. ("AHM", and together with the Debtors, the "Parties").

7 **RECITALS**

8 1. The Debtors filed voluntary petitions for relief under chapter 11 of title
9 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* ("Bankruptcy Code") on May
10 6, 2019 (the "Petition Date").

11 2. On July 7, 2020, the Debtors filed the Joint Chapter 11 Plan of
12 Reorganization of Astria Health and Its Debtor Affiliates (the "Plan") [Docket No.
13 1471], which was amended on November 4, 2020 and November 11, 2020 [Docket
14 Nos. 1967, 1986] and the Disclosure Statement Relating to the Joint Chapter 11 Plan
15 of Reorganization of Astria Health and Its Debtor Affiliates (the "Disclosure
16 Statement") [Docket No. 1472] describing the Plan, which was amended on
17 November 4, 2020 and November 11, 2020 [Docket Nos. 1968, 1987]. The Plan
18 proponents are the Debtors and Lapis (collectively, the "Plan Proponents").

19 3. The Court entered an order on November 12, 2020, approving the
20 Disclosure Statement. [Docket No. 1991].

21 **STIPULATION**

DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, CA 90017-5704
2 Phone: (213) 623-9300
Fax: (213) 623-9924

BUSH KORNFELD LLP
LAW OFFICES
601 Union St., Suite 5000
Seattle, Washington 98101-2373
Telephone (206) 292-2110
Facsimile (206) 292-2104

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

The Plan Proponents' Response Deadline shall be extended until December 16, 2020, at 9:00 a.m.

STIPULATION

DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, CA 90017-5704
Phone: (213) 623-9300
Fax: (213) 623-9924

BUSH KORNFELD LLP
LAW OFFICES
601 Union St., Suite 5000
Seattle, Washington 98101-2373
Telephone (206) 292-2110
Facsimile (206) 292-2104

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

Presented by:

Astria Health, et al.

By: /s/ Samuel R. Maizel

Samuel R. Maizel

Sam J. Alberts

Geoffrey M. Miller

DENTONS US LLP

Counsel to Debtors and Debtors In Possession

and

By: /s/ Daniel J. Bugbee

Daniel J. Bugbee, WSBA No. 42412

155 NE 100th St., Suite 205

Seattle, WA 98125

Telephone: (206) 489-3819

dbugbee@lawdbs.com

Attorneys for AHM, Inc.

STIPULATION

DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, CA 90017-5704
Phone: (213) 623-9300
Fax: (213) 623-9924

BUSH KORNFIELD LLP
LAW OFFICES
601 Union St., Suite 5000
Seattle, Washington 98101-2373
Telephone (206) 292-2110
Facsimile (206) 292-2104