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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:

BEVERLY COMMUNITY HOSPITAL
ASSOCIATION, dba BEVERLY HOSPITAL
(A NONPROFIT PUBLIC BENEFIT
CORPORATION), *et al*,¹

Debtors,

Case No.: 2:23-bk-12359-SK

Joint administration requested with:

Case No: 2:23-bk-12360-SK

Case No: 2:23-bk-12361-SK

Chapter 11 Case

- ☒ Affects all Debtors
- ☐ Affects Beverly Community
Hospital Association
- ☐ Montebello Community Health
Services, Inc.
- ☐ Beverly Hospital Foundation

**DEBTORS' EMERGENCY MOTION FOR
ORDER (A) EXTENDING TIME FOR
DEBTORS TO FILE SCHEDULES AND
STATEMENTS, (B) AUTHORIZING THE
DEBTORS TO FILE A CONSOLIDATED
LIST OF CREDITORS IN LIEU OF
SUBMITTING A SEPARATE MAILING
LIST OF CREDITORS FOR EACH
DEBTOR, (C) AUTHORIZING THE
DEBTORS TO FILE A CONSOLIDATED
LIST OF THE TOP THIRTY LARGEST**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Beverly Community Hospital Association d/b/a Beverly Hospital (6005), Montebello Community Health Services, Inc. (3550), and Beverly Hospital Foundation (9685). The mailing address for the Debtors is 309 W. Beverly Blvd., Montebello, California 90640.



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**UNSECURED CREDITORS; (D)
AUTHORIZING THE DEBTORS TO
REDACT CERTAIN PERSONAL
IDENTIFICATION INFORMATION, AND
(E) RELATED RELIEF**

Date: April 21, 2023
Time: 2:00 p.m.
Judge: Hon. Sandra R. Klein
Place: ZoomGov

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I.

RELIEF REQUESTED

The above-captioned debtors and debtors in possession (collectively, the “Debtors”)² hereby move, on an emergency basis (the “Motion”), pursuant to Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 1007(c) and Local Bankruptcy Rule 1007-1(b), to seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”): (a) extending the deadline by which the Debtors must file their schedules of assets and liabilities, schedules of current income and expenditures, schedules of executory contracts and unexpired leases and statements of financial affairs (collectively, the “Schedules”) by 21 days, for a total of 35 days from the Petition Date to and including May 24, 2023, without prejudice to the Debtors’ ability to request additional extension for cause shown; (b) authorizing the Debtors to file a consolidated master mailing list of creditors (“Master Mailing List”) in lieu of submitting a separate mailing list for each Debtor; (c) authorizing the Debtors to file a consolidated list of the Debtors’ 30 largest unsecured creditors in lieu of filing lists for each Debtor; (e) authorizing the Debtors to redact certain personal identification information; and (f) granting related relief.

II.

JURISDICTION AND VENUE

The United States Bankruptcy Court for the Central District of California (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *General Order No. 13-05* (C.D. Cal. Jul. 1, 2013), and Rule 5011-1(a) of the Local Bankruptcy Rules for the United States Bankruptcy Court Central District of California (the “Local Bankruptcy Rules”). This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

² A detailed description of the Debtors and their business, and the facts and circumstances supporting this Motion and the Debtors’ chapter 11 cases, are set forth in greater detail in the *Declaration of Alice Cheng in Support of the Debtors’ First Day Emergency Motions* (the “First Day Declaration”), filed contemporaneously with the Debtors’ voluntary petitions for relief filed under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), on the date hereof (the “Petition Date”). Capitalized terms used but not otherwise defined in this Motion have the meanings given to them in the First Day Declaration.

1 The bases for the relief requested herein are sections 105(a), 107(c)(1) of the Bankruptcy
2 Code, Rule 1007(a)(c) of the Bankruptcy Rules, and Rules 1007-1(b) and 2081-1(a)(2) of the
3 Local Bankruptcy Rules.

4 **III.**

5 **STATEMENT OF FACTS**

6 Beverly Hospital is a nonprofit, 202-bed hospital in Montebello that serves low-income
7 patients in the nearby Los Angeles area. As a safety net hospital, Beverly serves a geographic area
8 where half of the population lives under the 200% Federal Poverty Level. Beverly has been
9 historically underfunded and, in the post-Covid economy, became increasingly cash-strapped. With
10 91% of its patients relying on Medicare and Medi-Cal, the Hospital's financial struggles only
11 worsened as the cost of labor, medical supplies and medicine ballooned while government
12 reimbursement rates have stayed the same.

13 On the Petition Date, each of the Debtors filed a voluntary petition for relief under chapter
14 11 of the Bankruptcy Code. The Debtors are operating their business and managing their properties
15 as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
16 Concurrently with the filing of this Motion, the Debtors filed a motion requesting procedural
17 consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy
18 Rule 1015(b). No request for the appointment of a trustee or examiner has been made in these
19 chapter 11 cases, and no committees have been appointed or designated.

20 As of the date of this filing, no section 341(a) meeting has been scheduled.

21 The Debtors are working diligently to perform all tasks related to providing their patients
22 with quality healthcare services and managing these chapter 11 cases. To prepare the Schedules,
23 the Debtors must compile information from books, records, and documents relating to the claims of
24 thousands of creditors, as well as the Debtors' many assets, contracts, and leases. This information
25 is voluminous and located in numerous places throughout the Debtors' organization. Collecting the
26 necessary information requires an enormous expenditure of time and effort on the part of the
27 Debtors, the Hospital staff, and their professional advisors in the near term—when these resources

1 would be best used to stabilize the Debtors' business operations and most importantly, continuing
2 to provide quality healthcare services for their patients.

3 As a result, the Debtors request that this Court extend the time during which they must file
4 their Schedules to and including May 24, 2023.

5 **IV.**

6 **BASIS FOR RELIEF**

7 **A. Cause Exists for Extending the Deadline by Which the Debtors Must File the**
8 **Schedules.**

9 Pursuant to section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c), the Debtors
10 are required to file the Schedules within 14 days of the Petition Date. Fed. R. Bankr. P. 1007 (c).
11 However, Bankruptcy Rule 1007(c) also provides that, for cause shown, the Court may grant an
12 extension of the time for filing these Schedules.³ *Id.* "The cause shown language of Bankruptcy
13 Rule 1007(c) . . . requires the party seeking an enlargement of time simply to demonstrate some
14 justification for the issuance of the order. An application for an extension of time . . . normally will
15 be granted in the absence of bad faith or prejudice to the adverse party." *Byrant v. Smith*, 165 B.R.
16 176, 182 (W.D. Va. 1994) (comparing Bankruptcy Rule 1007(c) to Federal Rule 6(b)(1)) (citations
17 and quotations omitted).

18 Here, good and sufficient cause for granting an extension of time to file the Schedules exists.
19 The Debtors believe they will not be able to complete and file their Schedules within the fourteen-
20 day period otherwise provided by Bankruptcy Rule 1007(c) due to (i) the amount of time it will take
21 to prepare separate Schedules for each of the Debtors, (ii) their need to rely on Debtors' staff to
22 prepare such Schedules, (iii) their need to prioritize the pressing needs of providing critical
23 healthcare services to the Debtors' patients, and (iv) their need for management to assist counsel in
24 the preparation of various emergency "first day" motions.

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27 ³ Similarly, Bankruptcy Rule 1007(a)(5) provides that the relief sought is appropriately granted "for
28 cause shown and on notice to the United States Trustee and to any trustee, committee elected under
§ 705 or appointed under § 1102 of the Code, or other party as the court may direct."
Fed. R. Bankr. P. 1007(a)(5).

1 More specifically, the Debtors need the requested extension of time to file their Schedules
2 because to prepare the Schedules, the Debtors must compile information from books, records, and
3 documents relating to the claims of thousands of creditors, as well as the Debtors' many assets,
4 contracts, and leases. This information is voluminous and located in numerous places throughout
5 the Debtors' organization. Collecting the necessary information requires an enormous expenditure
6 of time and effort on the part of the Debtors, the Hospital staff, and their professional advisors in
7 the near term—when these resources would be best used to stabilize the Debtors' business
8 operations and most importantly, continuing to provide quality healthcare services for their patients.
9 Additionally, the Debtors have a limited number of qualified staff available to perform and oversee
10 all of its chapter 11 reporting obligations, and analyzing and compiling the information needed to
11 complete the Schedules will take significant time.

12 Although the Debtors, with the assistance of their professional advisors, are working
13 diligently and expeditiously to prepare the Schedules, the Debtors' resources are strained.
14 Considering the amount of work entailed in completing the Schedules combined with the competing
15 demands on the Debtors' employees and professionals to assist in efforts to stabilize business
16 operations during the initial postpetition period, the Debtors likely will not be able to complete the
17 Schedules and Statements properly and accurately within the required time period.

18 Prior to the filing of these chapter 11 cases, the Debtors focused on preparing for the chapter
19 11 filing and preparing Beverly Hospital to transition into chapter 11. Such efforts made it difficult
20 for the Debtors to prepare the Schedules. The Debtors anticipate that they may require at least 35
21 days after the Petition Date to complete the Schedules and Statements. The Debtors therefore
22 request that the Court extend the initial 14-day period for an additional 21 days, without prejudice
23 to the Debtors' right to request further extensions, for cause shown.

24 The Debtors submit that the extensive amount of information that must be assembled and
25 compiled, the multiple places where the information is located, and the hundreds of employee and
26 professional hours required to complete the Schedules constitute good and sufficient cause for
27 granting the requested extension of time.

1 The Debtors believe that no party would be prejudiced by the new deadlines as, under this
2 timeline. At the time of this filing, no section 341(a) meeting has been scheduled. However, the
3 Debtors will be file their Schedules before the section 341(a) meeting scheduled in these chapter 11
4 cases.

5 Under the circumstances of this case, the requested extension for an additional 21 days
6 beyond the standard 14-day period is reasonable and appropriate, and the Debtors submit that ample
7 cause exists to grant the requested relief.

8 **B. Filing a Consolidated Master Mailing List of Creditors in Lieu of Submitting a**
9 **Separate Creditor Mailing List for Each Debtor Is Warranted.**

10 Unless a debtor's schedules of assets and liabilities are filed simultaneously with a chapter
11 11 petition, section 521(a) of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1), require a debtor
12 to file a list containing the name and address of each creditor. Local Bankruptcy Rule 1007-1(a)
13 further states that debtors must submit a Master Mailing List at the same time a bankruptcy petition
14 is filed.

15 There are thousands of creditors and parties in interest in these chapter 11 cases. The Debtors
16 maintain lists of the names and addresses of all such entities on various computer software programs
17 that permit the Debtors, or a third-party service provider on the Debtors' behalf, to print mailing
18 labels for each such entity. Additionally, the Debtors have sought to retain KCC as their third-party
19 claims and noticing agent in these chapter 11 cases, who will be compiling and maintaining a full
20 list of consolidated creditors for all the Debtors. Separating these creditors out and preparing
21 separate Master Mailing Lists for each Debtor will take hundreds of hours and cost the estate
22 thousands of dollars. KCC will compile the Master Mailing List in the format required by Local
23 Rules, but requests Court authority to file and maintain one consolidated Master Mailing List for all
24 three Debtors in lieu of a Master Mailing List for each Debtor.

25 **C. Filing a Single Consolidated List of the Debtors' 30 Largest Unsecured Creditors Is**
26 **Warranted.**

27 Pursuant to Bankruptcy Rule 1007(d), a debtor must file "a list containing the name, address
28 and claim of the creditors holding the 20 largest unsecured claims, excluding insiders." Here,

1 compiling separate top creditor lists for each individual Debtor would consume an excessive amount
2 of the Debtors' time and resources, and filing a consolidated list would more appropriately reflect
3 the liabilities against the Debtors' operations on an enterprise level. Accordingly, the Debtors
4 request authority to file a single, consolidated list of their 30 largest general unsecured creditors.

5 **D. Redaction of Certain Confidential Information of Individuals Is Warranted.**

6 Section 107(c)(1) of the Bankruptcy Code provides that the Court:

7 for cause, may protect an individual, with respect to the following types of
8 information to the extent the court finds that disclosure of such information would
9 create undue risk of identity theft or other unlawful injury to the individual or the
individual's property:

10 (A) Any means of identification . . . contained in a paper filed, or to be filed, in a
case under [the Bankruptcy Code].

11 (B) Other information contained in a paper described in subparagraph (A).

12 11 U.S.C. § 107(c)(1).

13 The Debtors respectfully submit that it is appropriate to authorize the Debtors to redact from
14 any paper filed or to be filed with the Court in these chapter 11 cases, including the Master Mailing
15 List and Schedules, the home addresses of individuals—including the Debtors' employees, former
16 employees, and patients—because such information could be used to perpetrate identity theft or
17 locate survivors of domestic violence, harassment, or stalking. The risk is not merely speculative.
18 In at least one chapter 11 case, the abusive former partner of a debtor's employee used the publicly
19 accessible creditor and employee information filed in the chapter 11 case to track the employee at
20 her new address that had not been publicly available until then, forcing the employee to change
21 addresses again.⁴

22 The Debtors propose to provide, on a confidential basis, an unredacted version of the Master
23 Mailing List, Schedules, and any other filings redacted pursuant to the order entered on this Motion
24 (a) the Court and Clerk of the Court, the United States Trustee, to an official committee of unsecured
25 creditors appointed in these chapter 11 cases (if any), and (b) upon a request to the Debtors (email
26

27 ⁴ The incident, which took place during the first Charming Charlie chapter 11 proceedings in 2017, is described in
28 the "creditor matrix motion" filed in *In re Charming Charlie Holdings, Inc.*, No. 19-11534 (CSS) (Bankr. D. Del.
Jul. 11, 2019) [Docket No. 4]. A copy of the transcript will be provided upon request.

1 is sufficient), or to the Court that is reasonably related to these chapter 11 cases, or any party in
2 interest.

3 Numerous bankruptcy courts in other districts and jurisdictions have granted the relief
4 requested herein in other complex chapter 11 cases. *See, e.g., In re Clover Tech. Grp., LLC, et al.*,
5 No. 19-12680 (KBO) (Bankr. D. Del. Feb. 4, 2020) (authorizing the debtors to redact personal
6 identification information, including home address information, of all individuals on documents
7 filed with the court); *In re McDermott Int'l, Inc.*, No. 20-30336 (DRJ) (Bankr. S.D. Tex. Jan. 23,
8 2020) (same); *Aegean Marine Petroleum Net. Inc., et al.*, No. 18-13374 (MEW) (Bankr. S.D.N.Y.
9 Jan. 22, 2020) (authorizing the debtors to redact personal information of individuals from schedules
10 and statements); *In re Forever 21, Inc.*, No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019)
11 (authorizing the debtors to redact personally identifiable information, including home address
12 information, in respect of employees listed on a creditor matrix).

13 Several courts recently expounded on the importance of authorizing debtors to redact
14 individual creditors' personally identifiable information, including home addresses in particular. In
15 *Forever 21*, while overruling the objection of the United States Trustee for the District of Delaware
16 to the same redaction relief proposed here, Judge Gross noted that "[w]e live in a new age in which
17 the theft of personal identification is a real risk, as is injury to persons who, for personal reasons,
18 seek to have their addresses withheld." Hr'g Tr. at 60:22–25, *In re Forever 21, Inc.*, No. 19-12122
19 (KG) (Bankr. D. Del. Dec. 19, 2019).

20 For these reasons, the Debtors respectfully submit that cause exists to authorize the Debtors
21 to redact, pursuant to 11 U.S.C. § 107(c)(1), the home addresses of individuals listed on the Master
22 Mailing List, Schedules, or any other document filed with the Court. Absent such relief, the Debtors
23 would unnecessarily render individuals more susceptible to identity theft and could jeopardize the
24 safety of employees and other individual creditors who, unbeknownst to the Debtors, are survivors
25 of domestic violence, harassment, or stalking by publishing their home addresses without any
26 advance notice or opportunity to opt out or take protective measures.

27 V.

28 **EMERGENCY CONSIDERATION**

Bankruptcy Rule 6003 empowers a court to grant relief within the first 21 days after the petition date “to the extent that relief is necessary to avoid immediate and irreparable harm.” Fed. R. Bankr. P. 6003. Additionally, Local Bankruptcy Rule 2081-1(a)(2) allows a movant to request the type of relief herein for emergency consideration. For the reasons discussed above, (a) extending the deadline by which the Debtors must file their schedules of assets and liabilities, schedules of current income and expenditures, schedules of executory contracts and unexpired leases and statements of financial affairs by 21 days, for a total of 35 days from the Petition Date to and including May 24, 2023; (b) authorizing the Debtors to file a consolidated Master Mailing List in lieu of submitting a separate mailing list for each Debtor; (c) authorizing the Debtors to file a consolidated list of the Debtors’ 30 largest unsecured creditors in lieu of filing lists for each Debtor; and (e) authorizing the Debtors to redact certain personal identification information; and (f) granting related relief as requested herein is integral to the Debtors’ ability to transition their operations into these chapter 11 cases. Failure to receive such authorization and other relief during the first 21 days of these chapter 11 cases would severely disrupt the Debtors’ operations at this critical juncture. The relief requested is necessary in order for the Debtors to operate their business in the ordinary course and preserve the ongoing value of the Debtors’ operations and maximize the value of their estates for the benefit of all stakeholders. Accordingly, the Debtors submit that they have satisfied the “immediate and irreparable harm” standard of Bankruptcy Rule 6003 and request that the Court approve the relief requested in this Motion on an emergency basis.

VI.

WAIVER OF BANKRUPTCY RULE 6004(a) AND 6004(h)

To implement the foregoing successfully, the Debtors seek a waiver of the notice requirements under Bankruptcy Rule 6004(a) and the 14-day stay of an order authorizing the use, sale, or lease of property under Bankruptcy Rule 6004(h).

VII.

WAIVER OF MEMORANDUM OF POINTS AND AUTHORITIES

The Debtors respectfully request that this Court treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Local Bankruptcy Rule 9013-1(c).

VIII.

NOTICE

The Debtors will provide notice of this Motion via first class mail, facsimile or email (where available) to: (a) the Office of the U.S. Trustee Region 16; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) U.S. Bank, N.A. and counsel thereto; (d) Hanmi Bank and counsel thereto; (e) the Internal Revenue Service; (f) the Office of the Attorney General of the State of California; (g) the National Association of Attorneys General; and (h) all other parties who have filed a request for special notice and service of papers with the clerk of this Court.

No prior request for the relief sought in this Motion has been made by the Debtors to this Court or any other court.

[The remainder of this page intentionally left blank]

1 WHEREFORE, the Debtors respectfully request that the Court grant this Motion and enter
2 an order in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting
3 such other relief as is just and proper.

4 Dated: April 20, 2023

5 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

6
7 By /s/ Jennifer L. Nassiri
8 Jennifer L. Nassiri

9 JUSTIN R. BERNBROCK
10 JENNIFER L. NASSIRI
11 CATHERINE JUN
12 ROBERT B. McLELLARN
13 ALEXANDRIA G. LATTNER

14 Proposed Attorneys for Debtors and
15 Debtors in Possession
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Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:

BEVERLY COMMUNITY HOSPITAL
ASSOCIATION, dba BEVERLY HOSPITAL
(A NONPROFIT PUBLIC BENEFIT
CORPORATION), *et al*,⁵

Debtors,

Lead Case No.:

Jointly administered with:

Case No:

Case No:

Chapter 11 Case

- ☒ Affects all Debtors
- ☐ Affects Beverly Community
Hospital Association
- ☐ Montebello Community Health
Services, Inc.
- ☐ Beverly Hospital Foundation

**ORDER GRANTING DEBTORS'
EMERGENCY MOTION FOR ORDER (A)
EXTENDING TIME FOR DEBTORS TO
FILE SCHEDULES AND STATEMENTS,
(B) AUTHORIZING THE DEBTORS TO
FILE A CONSOLIDATED LIST OF
CREDITORS IN LIEU OF SUBMITTING
A SEPARATE MAILING LIST OF
CREDITORS FOR EACH DEBTOR, (C)
AUTHORIZING THE DEBTORS TO FILE
A CONSOLIDATED LIST OF THE TOP
THIRTY LARGEST UNSECURED
CREDITORS; (D) AUTHORIZING THE
DEBTORS TO REDACT CERTAIN
PERSONAL IDENTIFICATION
INFORMATION, AND (E) RELATED
RELIEF**

Date: April 20, 2023
Time: 2:00 p.m.
Judge: Hon. Sandra R. Klein
Place: ZoomGov

This Court, having considered the *Debtor's Emergency Motion for Order (A) Extending Time for the Debtors to File Schedules and Statements, (B) Authorizing the Debtors to File a Consolidated List of the Debtors' Creditors in Lieu of Submitting a Separate Mailing List of Creditors for Each Debtor, (C) Authorizing the Debtors to File a Consolidated List of Top Thirty Unsecured Creditors, (D) Authorizing the Debtors to Redact Certain Personal Identification Information, and (E) Related*

⁵ The Debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Beverly Community Hospital Association d/b/a Beverly Hospital (6005), Montebello Community Health Services, Inc. (3550), and Beverly Hospital Foundation (9685). The mailing address for the Debtors is 309 W. Beverly Blvd., Montebello, California 90640.

1 *Relief* (the “Motion”),⁶ filed by Beverly Community Hospital Association d/b/a Beverly Hospital,
2 Montebello Community Health Services, Inc., and Beverly Hospital Foundation, the debtors and
3 debtors-in-possession (collectively, the “Debtors”) on _____, 2023 [Doc No. ____], and upon the First
4 Day Declaration, and finding that proper notice was given and the and that good cause exists
5 therefor;

6 ORDERS as follows:

7 1. The Motion is GRANTED.

8 2. The deadline for the Debtors to file its schedules of assets and liabilities, statement
9 of financial affairs and related materials required under Rule 1007(b)(1) of the Federal Rules of
10 Bankruptcy Procedure, is hereby extended twenty-one (21) days, or to and including May 24, 2023.

11 3. The extension of time granted herein is without prejudice to the Debtors’ ability to
12 request additional time should it become necessary.

13 4. The Debtors are authorized to submit a consolidated Master Mailing List of creditors
14 in lieu of submitting separate mailing lists of creditors for each Debtor.

15 5. The Debtors are authorized to file a consolidated list of their 30 largest unsecured
16 creditors in the Debtors’ chapter 11 cases in lieu of each Debtor filing a list of its 30 largest
17 unsecured creditors.

18 6. The Debtors are authorized to redact the home addresses of individuals including,
19 but not limited to, the Debtors’ employees and former employees and any other Hospital staff any
20 Master Mailing List or filings with the Court. The Debtors are authorized to share an unredacted
21 Master Mailing List with the Court, any official committee of unsecured claims, the United States
22 Trustee, and any other party in interest who requests such addresses in writing.

23 7. The requirement under Local Bankruptcy Rule 9013-1(c) to file a memorandum of
24 law in connection with the Motion is waived.

25 8. The contents of the Motion satisfy the requirements of Bankruptcy Rule 6003(b).
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⁶ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

1 9. Notice of the Motion as provided therein shall be deemed good and sufficient notice
2 of the Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied
3 by such notice.

4 10. Notwithstanding Bankruptcy Rule 6004(h), this Order is immediately effective and
5 enforceable upon its entry.

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

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

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