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Proposed Attorneys for the Chapter 11 Debtors and  
Debtors In Possession

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

In re

VERITY HEALTH SYSTEM OF  
CALIFORNIA, INC., *et al.*,

Debtors and Debtors In  
Possession.

☒ Affects All Debtors

- ☐ Affects Verity Health System of  
California, Inc.  
☐ Affects O'Connor Hospital  
☐ Affects Saint Louise Regional Hospital  
☐ Affects St. Francis Medical Center  
☐ Affects St. Vincent Medical Center  
☐ Affects Seton Medical Center  
☐ Affects O'Connor Hospital Foundation  
☐ Affects Saint Louise Regional Hospital  
Foundation  
☐ Affects St. Francis Medical Center of  
Lynwood Foundation  
☐ Affects St. Vincent Foundation  
☐ Affects St. Vincent Dialysis Center, Inc.  
☐ Affects Seton Medical Center Foundation  
☐ Affects Verity Business Services  
☐ Affects Verity Medical Foundation  
☐ Affects Verity Holdings, LLC  
☐ Affects De Paul Ventures, LLC  
☐ Affects De Paul Ventures - San Jose ASC,  
LLC

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER

Jointly Administered With:  
Case No. 2:18-bk-20162-ER;  
Case No. 2:18-bk-20163-ER;  
Case No. 2:18-bk-20164-ER;  
Case No. 2:18-bk-20165-ER;  
Case No. 2:18-bk-20167-ER;  
Case No. 2:18-bk-20168-ER;  
Case No. 2:18-bk-20169-ER;  
Case No. 2:18-bk-20171-ER;  
Case No. 2:18-bk-20172-ER;  
Case No. 2:18-bk-20173-ER;  
Case No. 2:18-bk-20175-ER;  
Case No. 2:18-bk-20176-ER;  
Case No. 2:18-bk-20178-ER;  
Case No. 2:18-bk-20179-ER;  
Case No. 2:18-bk-20180-ER;  
Case No. 2:18-bk-20181-ER

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**NOTICE OF HEARINGS ON EMERGENCY  
FIRST-DAY MOTIONS FILED BY DEBTORS**

**Emergency Hearing:**

Date: September 5, 2018  
Time: 10:00 a.m.  
Place: United States Bankruptcy Court  
255 East Temple Street  
Courtroom 1568  
Los Angeles, California 90012

DENTONS US LLP  
601 SOUTH FIGUEROA STREET, SUITE 2500  
LOS ANGELES, CALIFORNIA 90017-5704  
(213) 623-9300



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1           **PLEASE TAKE NOTICE** that, on **Wednesday, September 5, 2018, at 10:00 a.m.**, the  
2 Court, pursuant to the *Court's Order Setting Hearing On First Day Motions* [Docket No. 18],  
3 attached hereto as Exhibit "1," will hold first-day hearings (the "Hearings") on the below-listed  
4 Emergency First-Day Motions (the "Motions") filed by Verity Health System Of California, Inc.  
5 ("VHS") and the above-referenced affiliated debtors, the debtors and debtors in possession in the  
6 above-captioned chapter 11 bankruptcy cases (collectively, the "Debtors"), in the above-captioned  
7 jointly administered chapter 11 bankruptcy cases. The Hearings will be held at the United States  
8 Bankruptcy Court for the Central District of California – Los Angeles Division, in Courtroom  
9 1568, located at 225 East Temple Street, Los Angeles CA, 90012.

10           **PLEASE TAKE FURTHER NOTICE** that the Motions, Related Pleadings (identified  
11 below), and other papers filed in support of the Motions, will be served upon you on August 31,  
12 2018, via either overnight mail, facsimile, personal service, or e-mail. Any parties seeking to  
13 obtain additional copies of the Motions, Related Pleadings, and other papers filed in support of  
14 the Motions may do so by contacting proposed counsel to the Debtors whose contact information  
15 is as follows: Dentons US, LLP, Attn: Tania Moyron, Esq., Email: [tania.moyron@dentons.com](mailto:tania.moyron@dentons.com),  
16 Tel: (213) 243-6101; Fax: (213) 623-9924, Address: 601 S. Figueroa St., Suite 2500, Los  
17 Angeles, CA 90017.

18           **The Motions That The Court Will Consider Are:**

- 19           • *Emergency Motion for Entry of Order (I) Authorizing the Debtors to (A) Pay Prepetition*  
20           *Employee Wages and Salaries, and (B) Pay and Honor Employee Benefits and Other*  
21           *Workforce Obligations; and (II) Authorizing and Directing the Applicable Bank to Pay*  
22           *All Checks and Electronic Payment Requests Made By the Debtors Relating to the*  
23           *Foregoing;*  
24           • *Emergency Motion of Debtors for Authority to: (1) Continue Using Existing Cash*  
25           *Management System, Bank Accounts and Business Forms; (2) Implement Changes to the*  
26           *Cash Management System in the Ordinary Course of Business; (3) Continue*  
27  
28

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*Intercompany Transactions; (4) Provide Administrative Expense Priority for Postpetition Intercompany Claims; and (5) Obtain Related Relief;*

- *Emergency Motion of Debtors for Interim and Final Orders (A) Authorizing the Debtors to Obtain Post Petition Financing (B) Authorizing the Debtors to Use Cash Collateral and (C) Granting Adequate Protection to Prepetition Secured Creditors Pursuant to 11 U.S.C. §§ 105, 363, 364, 1107 and 1108; Memorandum of Points and Authorities in Support Thereof; (the “Cash Collateral Motion”);*
- *Debtors’ Emergency Motion for Order (A) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service and (B) Determining Adequate Assurance of Payment For Future Utility Services;*
- *Debtors’ Emergency Motion: (A) Approving the Debtors Filing a Consolidated List of Fifty Largest General Unsecured Creditors for All Cases; (B) Approving the Debtors Filing a Consolidated Master Mailing Matrix for All Cases; and (C) Permitting the Debtors’ Claims and Noticing Agent to Maintain the Master Mailing Matrix;*
- *Emergency Motion For Entry Of An Order: (I) Authorizing The Debtors To (A) Maintain Insurance Program; (B) Pay Insurance Premiums In The Ordinary Course And (C) Pay All Obligations Associated Therewith; And (Ii) Preventing Insurance Companies From Enforcing Ipso Facto Clauses Or Giving Any Notice Of Termination Or Otherwise Modifying Any Insurance Policy Without Obtaining Relief From The Automatic Stay; and*
- *Emergency Motion For Entry Of An Order Authorizing The Filing Under Seal Of Confidential Patient Information; and*
- *Debtors’ Emergency Application For An Order (A) Appointing Kurtzman Carson Consultants LLC As Claims And Noticing Agent And (B) Approving The Form And Manner Of Notice Of Case Commencement.*

**The Related Pleadings To The Motions That The Court Will Consider Are:**

- *Declaration Of Richard G. Adcock In Support Of First Day Motions;*
- *Declaration of Anita Chou In Support of Cash Collateral Motion; and*

- *Statement Regarding Cash Collateral or Debtor in Possession Financing.*

**PLEASE TAKE FURTHER NOTICE** that any opposition to the Motions may be presented at Hearings on the Motions.

Dated: August 31, 2018

**DENTONS US LLP  
SAMUEL R. MAIZEL  
JOHN A. MOE, II  
TANIA M. MOYRON**

By /s/ Tania M. Moyron  
Tania M. Moyron

Proposed Attorneys for the Chapter 11  
Debtors and Debtors In Possession

DENTONS US LLP  
601 SOUTH FIGUEROA STREET, SUITE 2500  
LOS ANGELES, CALIFORNIA 90017-5704  
(213) 623-9300

# EXHIBIT 1

# EXHIBIT 1

FILED & ENTERED

AUG 31 2018

CLERK U.S. BANKRUPTCY COURT  
Central District of California  
BY gonzalez DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION

In re: Verity Health System of California,  
Inc., *et al.*,  
Debtor and Debtor in Possession.

Lead Case No.: 2:18-bk-20151-ER  
Chapter 11

☒ Affects All Debtors

- ☐ Affects Verity Health System of California, Inc.
- ☐ Affects O'Connor Hospital
- ☐ Affects Saint Louise Regional Hospital
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- ☐ Affects De Paul Ventures, LLC
- ☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors in Possession.

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Case No. 2:18-bk-20179-ER;  
Case No. 2:18-bk-20180-ER;  
Case No. 2:18-bk-20181-ER;

Chapter 11 Cases.

**ORDER SETTING HEARING ON FIRST DAY  
MOTIONS**

Date: September 5, 2018  
Time: 10:00 a.m.  
Location: Ctrm. 1568  
Roybal Federal Building  
255 East Temple Street  
Los Angeles, CA 90012

On **Wednesday, September 5, 2018, at 10:00 a.m.**, the Court will conduct a hearing on the Debtor's motions to (1) authorize the use of cash collateral, (2) pay prepetition wages, and (3) authorize other appropriate relief (collectively, the "First Day Motions"). Good cause appearing, the Court HEREBY ORDERS as follows:

- 1) By no later than **Friday, August 31, 2018, at 9:00 p.m.**, the Debtor must provide telephonic notice of the hearing on the First Day Motions to the entities asserting an interest in the cash collateral, the secured creditors, the twenty largest unsecured creditors, and the Office of the United States Trustee.
- 2) The First Day Motions must be filed with the Court by no later than **Friday, August 31, 2018**.
- 3) The First Day Motions and a copy of this Order must be served upon the entities asserting an interest in the cash collateral, the secured creditors, the twenty largest unsecured creditors, and the Office of the United States Trustee by no later than **Friday, August 31, 2018**. Service may be accomplished by any of the following methods: (a) personal service, (b) overnight mail, (c) facsimile, or (d) e-mail.
- 4) By no later than **Tuesday, September 4, 2018, at 10:00 a.m.**, the Debtor must file a declaration establishing that service was made in accordance with this Order.
- 5) Any opposition to the First Day Motions may be presented at the hearing.

IT IS SO ORDERED.

###

Date: August 31, 2018



Ernest M. Robles  
United States Bankruptcy Judge

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 601 South Figueroa Street, Suite 2500, Los Angeles, CA 90017:

A true and correct copy of the document entitled (*specify*): **NOTICE OF HEARINGS ON EMERGENCY FIRST-DAY MOTIONS FILED BY DEBTORS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the document will be served by the court via NEF and hyperlink to the document. On (date) **August 31, 2018**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) **August 31, 2018**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **August 31, 2018**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**BY PERSONAL DELIVERY**

Hon. Ernest M. Robles  
US Bankruptcy Court  
Central District of California  
Edward R. Roybal Building & Courthouse  
255 E. Temple Street, Suite 1560/Ctrm. 1568  
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 31, 2018 Christina O'Meara  
Date Printed Name

/s/Christina O'Meara  
Signature