Cas	e 2:18-bk-20151-ER Doc 72 Filed 00″ Main Document	Page 1 of 2
1 2 3 4 5 6 7 8	SAMUEL R. MAIZEL (Bar No. 189301) samuel.maizel@dentons.com JOHN A. MOE, II (Bar No. 066893) john.moe@dentons.com TANIA M. MOYRON (Bar No. 235736) tania.moyron@dentons.com DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 Tel: (213) 623-9300 / Fax: (213) 623-9924 Proposed Attorneys for the Chapter 11 Debt Debtors In Possession	ors and S BANKRUPTCY COURT
9	CENTRAL DISTRICT OF CAI	LIFORNIA - LOS ANGELES DIVISION
10		
11	In re	Lead Case No. 2:18-bk-20151-ER
12	VERITY HEALTH SYSTEM OF CALIFORNIA, INC., <i>et al.</i> ,	Jointly Administered With: Case No. 2:18-bk-20162-ER;
13	Debtors and Debtors In Possession.	Case No. 2:18-bk-20163-ER; Case No. 2:18-bk-20164-ER; Case No. 2:18-bk-20165-ER;
14	⊠ Affects All Debtors	Case No. 2:18 bk 20105 ER; Case No. 2:18-bk-20167-ER; Case No. 2:18-bk-20168-ER
15		Case No. 2:18-bk-20169-ER;
16	□ Affects Verity Health System of California, Inc.	Case No. 2:18-bk-20171-ER; Case No. 2:18-bk-20172-ER;
17	<ul> <li>Affects O'Connor</li> <li>Affects Saint Louise Regional Hospital</li> </ul>	Case No. 2:18-bk-20173-ER; Case No. 2:18-bk-20175-ER;
18	<ul> <li>Affects St. Francis Medical Center</li> <li>Affects St. Vincent Medical Center</li> </ul>	Case No. 2:18-bk-20176-ER; Case No. 2:18-bk-20178-ER;
19	<ul> <li>Affects Seton Medical Center</li> <li>Affects O'Connor Hospital Foundation</li> </ul>	Case No. 2:18-bk-20179-ER; Case No. 2:18-bk-20180-ER;
20	Affects Saint Louise Regional Hospital Foundation	Case No. 2:18-bk-20181-ER
21	Affects St. Francis Medical Center of Lynwood Foundation	Chapter 11 Cases
22	<ul> <li>☐ Affects St. Vincent Foundation</li> <li>☐ Affects St. Vincent Dialysis Center, Inc.</li> <li>☐ Affects Seton Medical Center Foundation</li> </ul>	NOTICE OF ERRATA TO EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO (A)
23	□ Affects Verity Business Services	MAINTAIN INSURANCE PROGRAM, (B) PAY
24	□ Affects Verity Medical Foundation □ Affects Verity Holdings, LLC	INSURANCE PREMIUMS IN THE ORDINARY COURSE AND (C) PAY ALL OBLIGATIONS
25	<ul> <li>Affects De Paul Ventures, LLC</li> <li>Affects De Paul Ventures - San Jose Dialysis, LLC</li> </ul>	ASSOCIATED THEREWITH; AND (II) PREVENTING INSURANCE COMPANIES FROM ENFORCING IPSO FACTO CLAUSES
26	-	OR GIVING ANY NOTICE OF TERMINATION OR OTHERWISE MODIFYING ANY
27	Debtors and Debtors In Possession.	INSURANCE POLICY WITHOUT OBTAINING RELIEF FROM THE AUTOMATIC STAY
28		[DOCKET NO. 24]
	108955103\V-1	1820151180905000000000002

DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 (213) 623-9300

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#### 1 THE HONORABLE ERNEST M. ROBLES, UNITED STATES BANKRUPTCY JUDGE 2 FOR THE CENTRAL DISTRICT OF CALIFORNIA, AND ALL PARTIES ENTITLED 3 **TO NOTICE:**

PLEASE TAKE NOTICE that Verity Health System of California, Inc. and the above-4 5 referenced affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 6 11 bankruptcy cases (collectively, the "Debtors") hereby correct the *Emergency Motion for Entry* 7 of an Order (I) Authorizing the Debtors to (A) Maintain Insurance Program, (B) Pay Insurance 8 Premiums in the Ordinary Course and (C) Pay All Obligations Associated Therewith; and (II) 9 Preventing Insurance Companies from Enforcing Ipso Facto Clauses or Giving Any Notice of 10 Termination or Otherwise Modifying Any Insurance Policy Without Obtaining Relief from the Automatic Stay [Docket No. 24] (the "Motion"), which inadvertently failed to attach the schedule 11 12 of Insurance Policies (as defined therein). [See Docket No. 24, at 7, line 12 (referencing "Exhibit 13 <u>A</u>")]. The Debtors attach hereto <u>Exhibit A</u> to the Motion.

Dated: September 5, 2018

/s/Tania M. Moyron Bv Tania M. Moyron

DENTONS US LLP

SAMUEL R. MAIZEL JOHN A. MOE, II

TANIA M. MOYRON

Proposed Attorneys for the Chapter 11 Debtors and Debtors In Possession

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# **EXHIBIT A**

# to

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 [DOCKET NO. 24]

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Insurance Coverage	Carrier	First Named Insured	Policy Period	Policy Number	Payment Plan	Ori	ginal Premium Amount	Premium nstallments Jutstanding	emium Amount after 8/31/18	Installment Due Dates	Premium Total Outstanding
All Other Coverages											
Storage Tank Liability	ACE American Insurance Company (Chubb)	O'Connor Hospital	6/30/18-6/30/19	G24668538 010	Annual Premium Due Up Front	\$	1,383	\$ -	\$	7/10/2018	
Commercial Property	American Guarantee and Liability Insurance Company (Zurich)	Verity Health System of California, Inc.	7/1/18-7/1/19	ZMD7067455-00	Annual Premium Due Up Front	\$	664,067	\$ -	\$ -	7/15/2018	
Workers' Compensation and Employers Liability	Old Republic Insurance Company	Verity Health System of California, Inc.	7/1/18-7/1/19	MWC 313800-00	Quarterly Installments	\$	2,044,515	\$511,128 \$511,128 \$511,128	\$511,128 \$511,128 \$511,128	<del>7/1</del> , 10/1, 1/1, 4/1	\$1,533,384
Storage Tank Liability	ACE American Insurance Company (Chubb)	Saint Louise Regional Hospital	9/5/17-9/5/18	G24761253 005	Annual Premium Due Up Front	\$	1,544	\$ -	\$	9/20/2017	
Storage Tank Liability	ACE American Insurance Company (Chubb)	St. Vincent Medical Center	9/18/17-9/18/18	G24728298 006	Annual Premium Due Up Front	\$	7,650	\$ -	\$ -	9/18/2017	
Commercial Automobile	National Union Fire Insurance Company of Pittsburgh, PA (AIG)	Verity Health System of California, Inc.	10/1/17-10/1/18	034-24-84	Annual Premium Due Up Front	\$	89,919	\$ -	\$ -	10/9/2017	
Helipad Liability & Non-Owned Aircraft Liability	StarNet Insurance Company (Berkley Aviation)	Verity Health System of California, Inc.	10/1/17-10/1/18	BA-17-10-00078	Annual Premium Due Up Front	\$	11,964	\$ -	\$ -	10/19/2017	
Sexual Misconduct and Molestation Liability	Lloyds of London (Beazley Syndicates #2623/#623)	St. Francis Medical Center (Children's Counseling Center Agreement)	10/1/17-10/1/18	GLOPR1701815	Annual Premium Due Up Front	\$	30,960	\$ -	\$ -	10/11/2017	

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Insurance Coverage	Carrier	First Named Insured	Policy Period	Policy Number	Payment Plan	Original Premium Amount	Premium Installments Outstanding	Premium Amount due after 8/31/18	Installment Due Dates	Premium Total Outstanding
D&O Liability, Employment Practices Liability, Fiduciary Liability, Crime <i>Primary Layer</i>	National Union Fire Insurance Company of Pittsburgh, PA (AIG)	Verity Health System of California, Inc.	10/1/17-10/1/18	02-359-65-60	Annual Premium Due Up Front	\$ 318,320	\$-	\$ -	10/29/2017	
D&O Liability and Employment Practices Liability 1st Excess Layer	Endurance Risk Solutions Assurance Company	Verity Health System of California, Inc.	10/1/17-10/1/18	BLX10008286901	Annual Premium Due Up Front	\$ 170,940	\$ -	\$ -	10/29/2017	
D&O Liability Only 2nd Excess Layer	Argonaut Insurance Company (ARGO Group)	Verity Health System of California, Inc.	10/1/17-10/1/18	MLX 7602088-01	Annual Premium Due Up Front	\$ 87,000	\$ -	\$-	10/29/2017	
Punititve Damages Wrap Primary Layer	American International Reinsurance Company, Ltd.	Verity Health System of California, Inc.	10/1/17-10/1/18	24542026	Annual Premium Due Up Front	\$ 24,241	\$-	\$-	10/12/2017	
Punititve Damages Wrap 1st Excess Layer	Magna Carta Insurance, Ltd.	Verity Health System of California, Inc.	10/1/17-10/1/18	MCEN204155	Annual Premium Due Up Front	\$ 17,094	\$ -	\$ -	10/12/2017	
Storage Tank Liability	ACE American Insurance Company (Chubb)	Seton Medical Center	10/08/17-10/08/18	G24730268 006	Annual Premium Due Up Front	\$ 1,360	\$-	\$ -	10/19/2017	
Storage Tank Liability	ACE American Insurance Company (Chubb)	Saint Louise Regional Hospital/De Paul Health Center	12/02/17-12/02/18	G24776062 005	Annual Premium Due Up Front	\$ 1,976	\$ -	\$ -	12/2/2017	
Storage Tank Liability	Tokio Marine Specialty Insurance Company (Philadelphia)	St. Francis Medical Center	12/05/17-12/05/18	STEP011394-00	Annual Premium Due Up Front	\$ 768	\$ -	\$ -	12/5/2017	
General Liability	Chubb	St. Francis Medical Center (Lynwood Parking Agreement)	3/31/17-3/31/18	HPL G2181684A 010	Annual Premium Due Up Front	\$ 526	\$ -	\$ -	4/19/2018	
Physicians Professional Liability										

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Insurance Coverage	Carrier	First Named Insured	Policy Period	Policy Number	Payment Plan	Original Premium Amount	Premium Installments Outstanding	Premium Amount due after 8/31/18	Installment Due Dates	Premium Total Outstanding
Professional Liability	NORCAL Mutual Insurance Company	The Contracted Physicians of O'Connor Hospital	1/1/18-1/1/19	728814N	Quarterly Installments	\$ 103,061	\$ 25,763.00	\$ 25,763.00	<del>1/30, 4/1, 7/1</del> , 10/1	\$25,763
Professional Liability	NORCAL Mutual Insurance Company	The Contracted Physicians of St. Francis Medical Center	1/1/18-1/1/19	728812N	Quarterly Installments	\$ 734,377	\$ 185,064.00	\$ 185,064.00	<del>1/30, 4/1, 7/1</del> , 10/1	\$185,064
Captive										
Professional and General Liability	Marillac Insurance Company, Ltd.	Verity Health System of California, Inc.	3/31/18-3/31/19	DOC PLGL-26000-018	Quarterly Installments	\$ 6,188,540	\$1,547,135 (10/31/18) \$1,547,135 (12/28/18)	\$1,547,135 (10/31/18) \$1,547,135 (12/28/18)	<del>4/30, 7/31</del> , 10/31, 12/28	\$3,094,270
Excess Professional and Umbrella Liability (See Reinsurance Below)	Marillac Insurance Company, Ltd.	Verity Health System of California, Inc.	3/31/18-3/31/19	DOC XL PLGL-26000-018	See Reinsurance Below				N/A	
Workers Compensation Deductible Liability Protection	Marillac Insurance Company, Ltd.	Verity Health System of California, Inc.	7/1/18-7/1/19	DED.WC-07.01.18-19	Quarterly Installments	\$ 6,939,472	\$1,734,868 (10/1/18) \$1,734,868 (1/1/19) \$1,734,868 (4/1/19)	\$1,734,868 (10/1/18) \$1,734,868 (1/1/19) \$1,734,868 (4/1/19)	<del>7/1</del> , 10/1, 1/1, 4/1	\$5,204,604
Reinsurance										
Lead Excess Layer	ACE American Insurance Company (Chubb)	Verity Health System of California, Inc.	3/31/18-3/31/19	RBN G21816838 011	Annual Premium Due Up Front	\$ 795,000	\$-	\$-	4/30/2018	
2nd Excess Layer	Continental Casualty Company (CNA)	Verity Health System of California, Inc.	3/31/18-3/31/19	HMU 2097462209	Annual Premium Due Up Front	\$ 157,259	\$ -	\$ -	4/30/2018	
3rd Excess Layer	Berkshire Hathaway Specialty Insurance Company	Verity Health System of California, Inc.	3/31/18-3/31/19	47-RHC-304968-01	Annual Premium Due Up Front	\$ 134,000	\$ -	\$ -	4/30/2018	

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Insurance Coverage	Carrier	First Named Insured	Policy Period	Policy Number	Payment Plan	Original Premium Amount	Premium Installments Outstanding	Premium Amount due after 8/31/18	Installment Due Dates	Premium Total Outstanding
4th Excess Layer	Zurich American Insurance Company	Verity Health System of California, Inc.	3/31/18-3/31/19	HPC 0239123-00	Annual Premium Due Up Front	\$ 60,000	\$ -	\$-	4/30/2018	
5th Excess Layer	The Medical Protective Company	Verity Health System of California, Inc.	3/31/18-3/31/19	XOL2018-023	Annual Premium Due Up Front	\$ 60,000	\$-	\$ -	4/30/2018	
Surety Bonds										
CA DHS Patient Trust Bond	Hartford Fire Insurance Company	Seton Medical Center Coastside	12/1/17-12/1/18	83BSBBF7598	Annual Premium Due Up Front	\$ 375	\$	\$ -	12/1	
CA DHS Patient Trust Bond	Hartford Fire Insurance Company	St. Francis Medical Center	12/1/17-12/1/18	83BSBBF7621	Annual Premium Due Up Front	\$ 100	\$ -	\$ -	12/1	
CA DHS Patient Trust Bond	Hartford Fire Insurance Company	St. Vincent Medical Center	12/1/17-12/1/18	83BSBBF7625	Annual Premium Due Up Front	\$ 100	\$-	\$ -	12/1	
CA DHS Patient Trust Bond	Hartford Fire Insurance Company	Saint Louise Regional Hospital	12/1/17-12/1/18	83BSBBF7637	Annual Premium Due Up Front	\$ 100	\$ -	\$ -	12/1	
CA DHS Patient Trust Bond	Hartford Fire Insurance Company	O'Connor Hospital	12/1/17-12/1/18	83BSBBF7648	Annual Premium Due Up Front	\$ 250	\$	\$ -	12/1	
CA DHS Patient Trust Bond	Hartford Fire Insurance Company	Seton Medical Center	12/1/17-12/1/18	83BSBBF7661	Annual Premium Due Up Front	\$ 175	\$-	\$ -	12/1	