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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. 18-bk-20151

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

Hon. Ernest M. Robles

**STIPULATION EXTENDING DEADLINES FOR  
AETNA LIFE INSURANCE COMPANY TO  
FILE OBJECTIONS TO MOTION  
AUTHORIZING DEBTORS TO OBTAIN POST  
PETITION FINANCING AND USE CASH  
COLLATERAL**

**Continued Hearings:**

Date: October 3, 2018

Time: 10:00 a.m. (PDT)

Place: United States Bankruptcy Court

Courtroom 1568

255 East Temple Street

Los Angeles, California 90012

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1 This Stipulation is entered between Verity Health System Of California, Inc. (“VHS”) and  
2 the above-referenced affiliated debtors, the debtors and debtors in possession in the above-  
3 captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), in the above-referenced  
4 jointly administered Chapter 11 bankruptcy cases, on the one hand, and Aetna Life Insurance  
5 Company (“Aetna”), on the other, with respect to the following:

6 1. On August 31, 2018, the Debtors each filed a voluntary petition for relief under  
7 chapter 11 of title 11 of the United States Code.

8 2. Among other “First-Day Motions,” the Debtors filed their *Emergency Motion of*  
9 *Debtors for Interim and Final Orders (A) Authorizing the Debtors to Obtain Post Petition*  
10 *Financing (B) Authorizing the Debtors to Use Cash Collateral and (C) Granting Adequate*  
11 *Protection to Prepetition Secured Creditors Pursuant to 11 U.S.C. §§ 105, 363, 364, 1107 and*  
12 *1108; Memorandum of Points and Authorities in Support Thereof* [Docket No. 31] (the “Motion  
13 Authorizing Debtors to Obtain Post Petition Financing and Use Cash Collateral”).

14 3. On September 6, 2018, the Court entered an interim order (the “Order”) [Docket  
15 No. 86] granting the foregoing Motion Authorizing Debtors to Obtain Post Petition Financing and  
16 Use Cash Collateral.

17 4. Pursuant to the Order, the Court set the following deadlines: (i) any party in  
18 interest, including Aetna, is required to file oppositions by no later than September 19, 2018, at  
19 4:00 p.m. (Pacific Daylight Time) (the “Opposition Deadline”); and (ii) any reply by the Debtors  
20 is due by September 26, 2018 (the “Reply Deadline”).


21 5. Aetna has requested an extension of the Opposition Deadline and the Debtors  
22 have agreed.

23 **NOW, THEREFORE**, all of the parties to this Stipulation hereby stipulate and agree as  
24 follows:


25 A. The Opposition Deadline shall be extended from September 19, 2018, at 4:00  
26 p.m. (Pacific Daylight Time), to September 24, 2018, at 12:00 p.m. (Pacific Daylight Time).

1 B. The Reply Deadline shall be extended from September 26, 2018 to October 2,  
2 2018, at 12:00 p.m. (Pacific Daylight Time).  
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4 **Verity Health System of California, Inc., et al.**

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6 By: \_\_\_\_\_  
7 Samuel R. Maizel  
8 Tania M. Moyron  
9 Dentons US LL  
10 Proposed counsel to Debtors and Debtors In Possession  
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12 **Aetna Life Insurance Company**

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14 By: \_\_\_\_\_  
15 Jeffrey Krause  
16 Gibson Dunn & Crutcher  
17 Counsel to Aetna Life Insurance Company  
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