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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 UMB BANK NA,
AS SUCCESSOR MASTER TRUSTEE AND
AND WELLS FARGO BANK NA AS 2005 BOND
TRUSTEE TO FILE OBJECTIONS TO MOTION
AUTHORIZING DEBTORS TO OBTAIN POST
PETITION FINANCING AND USE CASH
COLLATERAL AND CRITICAL VENDOR
MOTION**

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

DENTONS US LLP
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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 UMB Bank N.A. as
5 Successor Master Trustee for the Master Indenture Obligations (“UMBB”) and Wells Fargo Bank
6 National Association. as Indenture Trustee for Series 2005 Revenue Bonds (“WFNA”) on the
7 other, with respect to the following:

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

10 2. Among other “First-Day Motions,” the Debtors filed their *Emergency Motion of*
11 *Debtors for Interim and Final Orders (A) Authorizing the Debtors to Obtain Post Petition*
12 *Financing (B) Authorizing the Debtors to Use Cash Collateral and (C) Granting Adequate*
13 *Protection to Prepetition Secured Creditors Pursuant to 11 U.S.C. §§ 105, 363, 364, 1107 and*
14 *1108; Memorandum of Points and Authorities in Support Thereof* [Docket No. 31] (the “Motion
15 Authorizing Debtors to Obtain Post Petition Financing and Use Cash Collateral”) and the
16 *Debtors’ Emergency Motion for Entry of Order Authorizing Debtors to Honor Prepetition*
17 *Obligations to Critical Vendors* [Docket No. 29] (the “Critical Vendor Motion” and, collectively
18 with the Motion Authorizing Debtors to Obtain Post Petition Financing and Use Cash Collateral,
19 the “Motions”).

20 3. On September 6, 2018, the Court entered interim orders (the “Orders”) [Docket
21 Nos. 86 and 134] granting the foregoing Motion Authorizing Debtors to Obtain Post Petition
22 Financing and Use Cash Collateral and Critical Vendor Motion on an interim basis.

23 4. Pursuant to the Orders, the Court set the following deadlines: (i) any party in
24 interest, including UMBB and WFNA, is required to file oppositions by no later than September
25 19, 2018, at 4:00 p.m. (Pacific Daylight Time) (the “Opposition Deadline”); and (ii) any reply by
26 the Debtors is due by September 26, 2018 (the “Reply Deadline”).
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5. UMBB and WFNA have requested an extension of the Opposition Deadline and the Debtors have agreed.

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

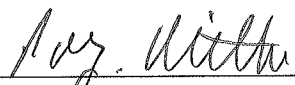
A. The Opposition Deadline shall be extended as to UMBB and WFNA from September 19, 2018, at 4:00 p.m. (Pacific Daylight Time), to September 24, 2018, at 2:00 p.m. (Pacific Daylight Time).

B. The Reply Deadline shall be extended from September 26, 2018 to October 2, 2018, at 12:00 p.m. (Pacific Daylight Time).


Verity Health System of California, Inc., et al.

By: 
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UMB Bank N.A.

By: 
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**Wells Fargo Bank, National Association,
as Series 2005 Bond Trustee**

By: 
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By: William Wassweiler / by consent

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