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Attorneys for JOSEFINA ROBLES, by and Through her Conservator, SERGIO ROBLES

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION

In re: VERITY HEALTH SERVICES 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 Dialysis, LLC	Lead Case No. 2:18-bk-20151-ER Chapter 11 REPLY OF JOSEFINA ROBLES TO: 1.) DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY; AND 2.) OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESPONSE TO MOTION FOR RELIEF FROM STAY; DECLARATION OF ALAN I. NAHMIAS IN SUPPORT THEREOF DATE: November 19, 2018 TIME: 10:00 A.M. CTRM. 1568

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NEITHER LAW NOR COMMON SENSE SUPPORTS DENIAL OF THE MOTION

There can be little dispute—the automatic stay was intended from the inception of the Bankruptcy Code[1] to be a shield; not a sword. Yet that is precisely what St. Francis Medical Center—the affected debtor ("Debtor") and the Creditors' Committee ask of this Court. Hiding behind the façade of "too much to do," both argue that the injuries sustained by Ms. Robles—horrible injuries sustained at the hands of the doctors and nurses who treated her at the St. Francis facility ("St. Francis")[2]—should be shunted off to some indeterminate future date. The excuse is that "we" – the debtors' professionals, cannot be distracted by personal injury litigation. Disingenuous is too kind a term. As the Court is aware, Debtor's counsel is a firm comprised of approximately 1250 lawyers in forty-three countries. It is respectfully submitted that a lack of "manpower" and available billable hours constitute the proverbial red herring. Further, counsel for the Debtors have stated on more than one occasion that this case will not result in a reorganization, so the need to focus their attentions on reorganizing is simply untrue.

Any chapter 11 lawyer who has ever worked on a reorganization case as large as this one,[3] knows that, as soon as stay relief is granted, the matter will be shipped off to litigation and/or coverage counsel. In fact, the lawyer for the ultimate litigation, Gillian Pluma, of the law firm LaFollette Johnson, has already been identified by the Debtor's bankruptcy counsel. In fact, Ms. Pluma appeared on at least one occasion in Los Angeles Superior Court in the underlying litigation. *See,* the Declaration of Alan I. Nahmias which is filed concurrently ("Nahmias Declaration"). The Debtor does not argue that its principals will be diverted from their efforts to restructure it, or its affiliates. It is submitted that the argument could not fairly be made. As indicated in the opposition to the Motion

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[1] Title 11, United States Code, § 101, et seq. ("Bankruptcy Code").

[2] A copy of the First Amended Complaint—the operative pleading in the Los Angeles Superior Court , which was appended as Exhibit "A" to the Declaration of Stuart Weissman in support of the Motion ("FAC")—provides a gory, point by point description of the process which left Ms. Robles a quadriplegic who will likely be on life support for the rest of her life. It is respectfully submitted that this is not a simple, "slip and fall" matter; not something that will be subject to a run of the mill claim objection. *See,* particularly, paragraph 48 of the FAC.

[3] Of course this is not a single case; but the dynamics do not change.

("Opposition") the principal architects of any reorganization in the related chapter 11 cases are the officers and other employees of the corporate parent. The litigation to which the Motion is related, involves medical malpractice claims as distinct from the claims involved in the cases on which the Debtor and the Committee rely.

THE PLUMBEREX FACTORS ACTUALLY SUPPORT THE GRANTING OF RELIEF

The Opposition cites In re Plumberex Specialty Products[4] for the proposition that there are twelve relevant factors; but concedes that not all twelve apply in all cases, and the twelve are not coequal in importance.

It is curious indeed that if each of the twelve "nonexclusive factors" which the Plumberex Court borrowed from In re Curtis, 40 B.R. 795 (Bankr. D.Utah 1984) are applied here, the overwhelming conclusion would be that they favor relief from stay.

(1) The relief requested will result in a complete resolution of the issues;

(2) The litigation, and its resulting judgment will not interfere with the bankruptcy case;

(3) No foreign proceeding is implicated;

(4) No "specialized tribunal" with jurisdiction over the medical malpractice claim has been established;

(5) It is likely; though not yet certain, that "the debtor's insurance carrier [will assume] financial responsibility for defending the litigation;

(6) The Debtor is not a "bailee;"

(7) The malpractice litigation will not prejudice "other creditors [or] the creditors' committee;

(8) The underlying judgment, once granted, will not be "subject to equitable subordination;"

(9) Success by the Conservator will not "resut in a judicial lien avoidable by the debtor[s] under Section 522(f);

(10) "[J]udicial economy" and "the expeditious determination of [the malpractice] litigation" will be served, by allowing the litigation to proceed;

[4] In re Plumberex Specialty Products, Inc., 311 B.R. 551 (Bankr. C.D.Cal. 2004). Judge Carroll borrows the dozen factors from In re Curtis, 40 B.R. 795 (Bankr.D.Utah 1984), *see*, Plumberex, *supra*, at 559.

(11) The parties have not yet "progressed to the point of [being] prepared for trial; so, at least arguably, this prong would be met by the Debtor, if it really chose to press the point; and

(12) "The balance of hurt" --- it is respectfully submitted that this standard cannot seriously be pressed by the Debtor or the Committee, but rather clearly rests upon Ms. Robles with the various injuries she has sustained.

The opinion concedes that although the statute provides that the stay may be lifted for "cause," the term is not defined. *See,* Plumberex, *supra* at 556. It is not clear whether the Debtor or its counsel would stipulate that a thirteenth factor ought to be added—preferably at the top of the list; and with special significance. That factor would be "justice."

THE SUMITOMO DECISION IS INAPPOSITE

The Debtor argues that Sumitomo Trust & Banking Co. v. Grand Rapids Hotel, L.P., 140 B.R. 643, 700 (Bankr. W.D. Mich. 1992) supports the notion that relief "requested in the early stages of the bankruptcy case" requires less of the debtor in terms of its opposition.[5] It is hardly surprising that Sumitomo, supra, was decided under section 362(d)(2)(B) of the Bankruptcy Code, whereas the Motion was filed under subsection (d)(1) of the Bankruptcy Code. *See,* Motion, pp. 3 and 5.

In what would appear to be a more appropriate analysis under almost identical to current circumstances, Bankruptcy Judge Richard L. Speer, quite some time ago, recognized and commented on the process of tort litigation and the appropriate—i.e. fair—application of the automatic stay as applied to personal injury tort claims. In his relatively brief, but forceful opinion in In re Bock Laundry Machine Co., 37 B.R. 564 (Bankr. D.Ohio 1984), Judge Speer focused on the practical effect on both parties of denying to extend the protection afforded by the automatic stay. Of particular note to the matter currently before the Court are his thoughts on the argument that the debtor would, somehow, be inconvenienced by participating in the underlying litigation. The following excerpt is both thoughtful and enlightening:

"The Courts have not, however, ascribed much significance to the fact that the debtor will be required to participate in their defense, **especially when the debtor's insurer is**

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[5] Opposition, p. 5, lines 22-25.

obligated to provide counsel. [citing, Matter of Holtkamp, 669 F.2d 505 (7th Cir. 1982)."

Fittingly, Judge Speer observed that the debtor in possession in Bock Laundry, *supra,* had "expressed some concern regarding the amount of time its officers will have to devote to litigation rather than the reorganization effort;" but he assessed the argument objectively, and concluded that "[t]he rules of discovery in most jurisdictions allow for methods of discovery which . . . may reduce the time the officers will be in litigation. [And,] [s]hould the burdens of defending the actions begin to impair the reorganization effort the Debtor-In-Possession may petition this Court for remedial measures." Again, Ms. Pluma and other members of her firm will be handling this matter once relief from stay has been granted. The Debtors' bankruptcy firm should have little or nothing to do with the case.

THIS CASE IS NOT NEWLY FILED

The Opposition argues that "[t]his case is only weeks old." *See,* Opposition, p. 5, line 10. By simple calendar arithmetic, the Case is seventy-five days old as of this writing. The argument that, somehow the Motion should be viewed as premature is illogical if not dishonest.

The Committee, echoing these arguments, adds little to the discussion. The Official Committee Of Unsecured Creditors' Response To Motion For Relief [etc.] [Dkt. # 777] ("Committee Opposition"), in its three pages of Opposition, contributes nothing of moment to the inquiry. Essentially, the Committee Opposition cites to two reported opinions which stand for the fundamental bromides: The Court has discretion to grant stay relief; and the Court may take reorganization prospects into account when applying its discretion.[6] To reiterate, there will be no reorganization in this case, and all parties know this. It is indeed disappointing that a body who owes a fiduciary duty to all unsecured creditors would assert such an argument and manifest so little sensitivity to the plight of this young woman who has suffered so horribly.

In consonance with the essential approach to opposing the Motion, the Committee cites to Plastech Eng. Products, 382 B.R. 90 (Bankr. E.D.Mich. 2008), a case which is so far from the facts

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6 *See*, the Committee Opposition, at p. 2, lines 10 through 22.

before this Court as to be incredible. In Plastech, *supra,* Chrysler asked for relief from stay to "enter into the Debtor's premises and take all of the tooling necessary for production of its component parts." 382 B.R. 90 at p. 107. The Court observed that " . . . if the stay is lifted . . . many of the Debtor's plants will have to immediately shut down . . ." *Id.* The question asks itself: Other than convenient boilerplate, what does Plastech, *supra* add to the analysis of the issues before this Court on the Motion at issue here? The answer, quite simply, is that it added nothing.

CONCLUSION

For each of the foregoing reasons, Movant prays that this Court grant the Motion in its entirety and for such other and further relief as it may deem appropriate.

Dated: November 14, 2018

MIRMAN, BUBMAN & NAHMIAS, LLP

By: ______________________________
ALAN I. NAHMIAS
STEPHEN F. BIEGENZAHN
Counsel to JOSEFINA ROBLES, by and through her Conservator, SERGIO ROBLES

DECLARATION OF ALAN I. NAHMIAS

I, ALAN I. NAHMIAS, declare and state:

1. I have personal knowledge of the following facts, and if called upon to testify as a witness thereto, I can and will do so.

2. I am an attorney at law, licensed by the State of California and admitted to practice before this United States Bankruptcy Court. I am a partner in Mirman, Bubman & Nahmias, LLP (the "Firm"), counsel of record for Sergio Robles as Conservator for his 25-year old daughter, Josefina Robles.

3. The Firm was retained by Mr. Robles on or about September 30, 2018 for the purpose of seeking relief from the automatic stay in his capacity as his daughter, Josefina's, conservator. Shortly after being retained, my office reached out to inquire of counsel for VHSC and St. Francis whether they would stipulate to relief from the automatic stay. The request was declined. As a result, the Firm was constrained to make a motion under section 362 of the Bankruptcy Code.

4. Since the Motion for Relief from Stay was filed, I have had various communications with Tania Moyron, one of the attorneys at the firm representing the Debtor in this Chapter 11 case. One of the communications between us was an email I received from Ms. Moyron on November 7, 2018, informing me that the Debtors' insurance counsel was Gillian N. Pluma of the firm of LaFollette Johnson. The email attached a copy of Ms. Pluma's business card. A true and correct copy of Ms. Moyron's email and the attached business card are attached hereto as Exhibit "B" and incorporated herein by this reference.

5. I am informed and believe that on November 9, 2018, a Status Conference in the underlying state court litigation, Case No. BC697012, was held before the Honorable Maurice A. Leiter, Judge, in the Los Angeles Superior Court.

6. I am further informed and believe that Ms. Pluma attended that hearing before Judge Leiter, as counsel appearing for the Debtor.

7. Finally, I am informed and believe that at the time of that Status Conference, Ms. Robles' state court counsel informed the Court that a Motion for Relief from the Automatic Stay had

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been filed in connection with the pending litigation, and that the stay was expected to be lifted at that time or shortly thereafter. Ms. Pluma did not dispute those representations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct; and that, if called as a witness, I can and will testify competently thereto. Executed November 14, 2018 at Woodland Hills, California.

ALAN I. NAHMIAS

Jackie Dale

From:	Moyron, Tania M. <tania.moyron@dentons.com>
Sent:	Wednesday, November 07, 2018 6:34 PM
To:	Alan Nahmias
Cc:	Moe, II, John A.; Maizel, Samuel R.; Stephen Biegenzahn
Subject:	RE: Verity Health - Confidential
Attachments:	G. Pluma card.pdf

You're welcome. Attached is the information we received for insurance counsel. Best, Tania

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EXHIBIT "B" PAGE 9

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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: 21860 Burbank Boulevard, Suite 360, Woodland Hills, CA 91367

A true and correct copy of the foregoing document entitled (*specify*): REPLY OF JOSEFINA ROBLES TO: 1.) DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY; AND 2.) OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESPONSE TO MOTION FOR RELIEF FROM STAY; DECLARATION OF ALAN I. NAHMIAS IN SUPPORT THEREOF
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 foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) November 14, 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:

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☐ Service information continued on attached page

2. <u>SERVED BY UNITED STATES MAIL</u>:
On (*date*) ____, 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 <u>will be completed</u> 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*) November 14, 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.

PRESIDING JUDGE'S COPY:
Honorable Ernest M. Robles
United States Bankruptcy Judge
255 East Temple Street, Suite 1560
Los Angeles, CA 90012
(via Federal Express)

☐ 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.

November 14, 2018	JACQUELINE DALE	Jackie Dale
Date	*Printed Name*	*Signature*