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Unsecured Creditors of Verity Health System of
California, Inc., et al.*

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

Debtors and Debtors In Possession.

Lead Case No. 18-20151
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

Chapter 11 Cases

Hon. Ernest M. Robles

**OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' RESPONSE
TO MOTION FOR RELIEF FROM STAY
(NON-BANKRUPTCY FORUM) FILED
BY NOBLE WILLIAMS [DKT. 582]**

Hearing:

Date: Nov. 19, 2018
Time: 10:00 a.m.
Location: Courtroom 1568
255 E. Temple St., Los Angeles, CA



1820151181115000000000036

1 The Official Committee of Unsecured Creditors of Verity Health System of
2 California, Inc., *et al.* (the “Committee”) appointed in connection with the chapter 11 cases of the
3 above-captioned debtors and debtors-in-possession (the “Debtors”), hereby submits this response to
4 the *Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 (with supporting declarations)*
5 (*Action in Non-Bankruptcy Forum*) filed by Noble Williams (the “Motion”) [Docket No. 582].

6 Because page 3 of the Motion states, “Movant seeks recovery only from applicable
7 insurance, if any, and waives any deficiency or other claim against the Debtor or property of the
8 Debtors’ bankruptcy estate,” the Committee does not oppose the Motion. However, the Committee
9 agrees with the Debtors’ request that the Court reserve on the issue of nondischargeability
10

11 DATED: November 15, 2018

MILBANK, TWEED, HADLEY & M^cCLOY LLP

12 /s/ Gregory A. Bray
13 GREGORY A. BRAY
14 MARK SHINDERMAN
JAMES C. BEHRENS

15 Counsel for the Official Committee of
16 Unsecured Creditors of Verity Health System of
17 California, Inc., et al.
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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:

2029 Century Park E, 33rd Floor, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled (*specify*): **OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESPONSE TO MOTION FOR RELIEF FROM STAY (NON-BANKRUPTCY FORUM) FILED BY NOBLE WILLIAMS [DKT. 582]** 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 15, 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*) November 15, 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*) November 15, 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.

☒ 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 15, 2018 Ricky Windom
Date Printed Name

/s/ Ricky Windom
Signature

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