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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 REFUGIO ESTRADA AND LIVIER  
MARQUEZ ESTRADA [DKT. 704]**

Hearing:

Date: Nov. 19, 2018

Time: 10:00 a.m.

Location: Courtroom 1568  
255 E. Temple St., Los Angeles, CA



1820151181115000000000037

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 Refugio Estrada and Livier Marquez Estrada (the  
6 “Motion”) [Docket No. 704].

7 Because page 3 of the Motion states, “Movant seeks recovery only from applicable  
8 insurance, if any, and waives any deficiency or other claim against the Debtor or property of the  
9 Debtors’ bankruptcy estate,” the Committee does not oppose the Motion.

10  
11 DATED: November 15, 2018

MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY 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, 33<sup>rd</sup> 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 REFUGIO ESTRADA AND LIVIER MARQUEZ ESTRADA [DKT. 704] 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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