

SAMUEL R. MAIZEL (Bar No. 189301)  
samuel.maizel@dentons.com  
JOHN A. MOE, II (Bar No. 066893)  
john.moe@dentons.com  
TANIA M. MOYRON (Bar No. 235736)  
tania.moyron@dentons.com  
DENTONS US LLP  
601 South Figueroa Street, Suite 2500  
Los Angeles, California 90017-5704  
Tel: (213) 623-9300 / Fax: (213) 623-9924

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.

Lead Case No. 2:18-bk-20151-ER

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

**SUBMISSION OF SIGNATURE PAGE OF  
DECLARATION OF RICHARD ADCOCK IN  
SUPPORT OF MOTION TO APPROVE  
SETTLEMENT AND ASSET PURCHASE  
AGREEMENT BY AND BETWEEN THE  
DEBTORS, VERITY MEDICAL FOUNDATION  
AND VERITY HEALTH SERVICES OF  
CALIFORNIA, INC., AND ALL CARE MEDICAL  
GROUP, INC. [RELATES TO DKT. NO. 1180]**

Date: January 23, 2019

Time: 10:00 a.m.

Place: Courtroom 1568

- ☒ 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

Debtors and Debtors In Possession.

DENTONS US LLP  
601 SOUTH FIGUEROA STREET, SUITE 2500  
LOS ANGELES, CALIFORNIA 90017-5704  
(213) 623-9300



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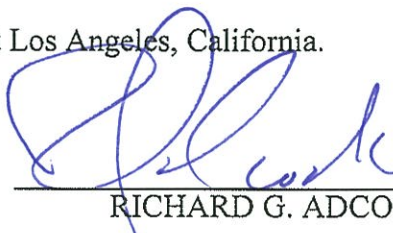
1 counter-party on or prior to the Closing Date. The All Care Agreements, including the Slauson  
2 Lease, listed in Exhibit A to the Rejection Motion which are not included in the list of Designated  
3 Contracts and are not terminated in accordance with the Settlement Agreement will remain subject  
4 to the Rejection Motion and, thus, shall be rejected by the Debtors.

5 12. The Designated Contracts consist of contracts with managed care organizations for  
6 which All Care has agreed to accept all obligations. The assignment of the Designated Contracts  
7 to All Care is necessary to effectuate the sale of the Purchased Assets to All Care so that All Care  
8 can continue to operate the Clinic. Thus, the Debtors have exercised their reasonable business  
9 judgment in assuming and assigning the Designated Contracts to All Care.

10 13. During the course of negotiations on the Settlement Agreement, All Care has  
11 simultaneously engaged in discussions with the counter-parties to the Designated Contracts for a  
12 continuing relationship under the Designated Contract. Upon information and belief, each counter-  
13 party to a Designated Contract has agreed to the assignment of its contract to All Care. Moreover,  
14 such counter-parties have adequate assurance that All Care will continue to perform under the terms  
15 of the Designated Contracts because All Care has managed the Clinic in the past and will continue  
16 to operate the Clinic in accordance with the Designated Contracts going forward.

17 I declare under penalty of perjury and of the laws in the United States of America, the  
18 foregoing is true and correct.

19 Executed this 2<sup>nd</sup> day of January, 2018, at Los Angeles, California.

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21   
22 RICHARD G. ADCOCK  
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