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*Counsel for the Official Committee of
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.
☐ O'Connor Hospital
☐ 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

**STIPULATION BETWEEN VERITY
MOB FINANCING, LLC AND THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS
EXTENDING CHALLENGE
DEADLINE**



1 This stipulation is entered between Verity MOB Financing, LLC ("Verity MOB"), on the one
2 hand, and the Official Committee of Unsecured Creditors in the above-captioned jointly
3 administered cases (the "Committee"), on the other, with respect to the following:

4 1. On September 14, 2018, the Committee was formed.

5 2. On October 4, 2018, the Court entered its *Final Order (I) Authorizing Postpetition*
6 *Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Providing*
7 *Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying*
8 *Automatic Stay, and (VI) Granting Related Relief* (the "Final DIP Order") [Docket No. 409].

9 3. Pursuant to paragraph 5(e) of the Final DIP Order, the Committee has 90 days from
10 the date of its formation to challenge Prepetition Liens (as defined in the Final DIP Order) asserted
11 by Verity MOB (the "Original Challenge Deadline").

12 4. By mutual agreement of Verity MOB and the Committee pursuant to that certain
13 Stipulation between Verity MOB Financing, LLC and the Official Committee of Unsecured
14 Creditors Extending Challenge Deadline entered into on December 13, 2018 [Docket No. 1045] (the
15 "Stipulation") the Original Challenge Deadline was extended 30 days (the "Challenge Deadline") on
16 the terms set forth therein.


17 5. The Challenge Deadline is currently January 14, 2019.

18 NOW, THEREFORE, all of the parties to this stipulation hereby stipulate as follows:


19 B. The Challenge Deadline shall be extended from January 14, 2019 by seven (7) days
20 to January 21, 2019 with respect to any assets of the Debtors not constituting Acknowledged
21 Collateral (as defined in the Stipulation). For the avoidance of doubt, nothing herein shall affect,
22 limit or impair any rights, claims or interests of Verity MOB in any existing or future assets of
23 Debtors whether or not they remain subject to the extended Challenge Period, including without
24 limitation, any and all rights held under or in connection with the Loan Documents (as defined in the
25 Stipulation) and the obligations issued thereunder.

26 [Signature page follows]
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2 **Verity MOB Financing, LLC**

3 By: 
4 Benjamin Rosenblum
5 Jones Day
6 Counsel to Verity MOB Financing, LLC

7
8 **Official Committee of Unsecured Creditors**

9 By: /AA
10 Gregory A. Bray
11 Mark Shinderman
12 James C. Behrens
13 Milbank, Tweed, Hadley & McCloy LLP
14 Counsel to the Official Committee of Unsecured Creditors
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