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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.

☒ 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 ASC,
LLC

Debtors and Debtors In Possession.

Lead Case No. 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

Hon. Ernest M. Robles

**STIPULATION EXTENDING DEADLINE FOR
ENGINEERS AND SCIENTISTS OF CALIFORNIA, IFPTE
LOCAL 20 TO FILE OBJECTION TO DEBTORS'
MOTION UNDER § 1113 OF THE BANKRUPTCY CODE
TO REJECT AND TERMINATE THE TERMS OF
ENGINEERS AND SCIENTISTS OF CALIFORNIA, IFPTE
LOCAL 20'S COLLECTIVE BARGAINING
AGREEMENTS WITH O'CONNOR HOSPITAL AND
SAINT LOUISE REGIONAL HOSPITAL UPON THE
CLOSING OF THE SALE OF HOSPITALS TO THE
COUNTY OF SANTA CLARA [RELATED DKT. NO. 1181]**

Hearing:

Date: January 30, 2019

Time: 10:00 a.m. (PDT)

Place: United States Bankruptcy Court

Courtroom 1568

255 East Temple St., Los Angeles, California 90012

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
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This Stipulation is entered between Verity Health System Of California, Inc. ("VHS") and the above-referenced affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the "Debtors"), in the above-referenced jointly administered Chapter 11 bankruptcy cases, on the one hand, and Engineers and Scientists of California, IFPTE Local 20 ("Local 20"), on the other, with respect to the following:

1. On August 31, 2018, the Debtors each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code.

2. On January 2, 2018, the Debtors filed the *Debtors' Motion Under § 1113 of the Bankruptcy Code to Reject and Terminate the Terms of Engineers and Scientists of California, IFPTE Local 20's Collective Bargaining Agreements With O'Connor Hospital and Saint Louise Regional Hospital Upon the Closing of the Sale of Hospitals to the County of Santa Clara* [Docket No. 1181] (the "Motion to Reject Local 20 CBA").

3. Pursuant to the Motion to Reject Local 20 CBA, the deadline for any party, including Local 20, to file a response is January 16, 2019 (the "Opposition Deadline").

4. Local 20 has requested an extension of the Opposition Deadline and the Debtors have agreed.

NOW, THEREFORE, all of the parties to this Stipulation hereby stipulate and agree as follows:

A. The Opposition Deadline shall be extended from January 16, 2019 to January 18, 2019, at 7:00 p.m. (Pacific Daylight Time).

B. The deadline for the Debtors to file a reply to any response to the Motion to Reject Local 20 CBA shall be extended from January 23, 2019 to January 25, 2019, at 7:00 p.m. (Pacific Daylight Time).

1 **Verity Health System of California, Inc., et al.**

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3 By: /s/ Tania M. Moyron
4 Samuel R. Maizel
5 Tania M. Moyron
6 Sam J. Alberts
7 Dentons US LLP
8 Counsel to Debtors and Debtors In Possession
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10 **Engineers and Scientists of California, IFPTE Local 20**

11 By: Mollie Simons
12 Mollie Simons
13 Leonard Carder LLP
14 Counsel to Engineers and Scientists of California, IFPTE Local 20
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