

GREGORY A. BRAY (Bar No. 115367)  
gbray@milbank.com  
MARK SHINDERMAN (Bar No. 136644)  
mshinderman@milbank.com  
JAMES C. BEHRENS (Bar No. 280365)  
jbehrens@milbank.com  
MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP  
2029 Century Park East, 33rd Floor  
Los Angeles, CA 90067  
Telephone: (424) 386-4000/Facsimile: (213) 629-5063

*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

**FOURTH STIPULATION BETWEEN  
UMB BANK, N.A. AND THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS REGARDING  
CHALLENGE DEADLINE**



1820151190213000000000007

1 This stipulation is entered between UMB Bank, N.A., as trustee (the “Master Trustee”), on the  
2 one 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 Superpriority*  
7 *Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying Automatic Stay,*  
8 *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 was provided 90  
10 days from the date of its formation, i.e. until December 13, 2018, to challenge Prepetition Liens (as  
11 defined in the Final DIP Order) asserted by the Master Trustee (the “Challenge Deadline”).

12 4. The Committee and Master Trustee entered into (i) that certain *Stipulation Between*  
13 *UMB Bank, N.A. and the Official Committee of Unsecured Creditors Extending Challenge Deadline*  
14 (the “First Challenge Deadline Stipulation”) [Docket No. 1049] prior to December 13, 2018, (ii) that  
15 certain *Stipulation Between UMB Bank, N.A. and the Official Committee of Unsecured Creditors*  
16 *Extending Challenge Deadline* (the “Second Challenge Deadline Stipulation”) [Docket No. 1250] on  
17 or around January 11, 2019 and (iii) that certain *Stipulation Between UMB Bank, N.A. and the Official*  
18 *Committee of Unsecured Creditors Extending Challenge Deadline* [Docket No. 1391] on or around  
19 January 28, 2019 (the “Third Challenge Deadline Stipulation”, and collectively with the First  
20 Challenge Deadline Stipulation and the Second Challenge Deadline Stipulation, the “Prior Challenge  
21 Deadline Stipulations”)


22 5. Among other terms, the Prior Challenge Deadline Stipulations (i) included the  
23 Committee’s acknowledgement of the Master Trustee’s valid and perfected liens on and security  
24 interests in the Acknowledged Collateral (as defined in the First Challenge Deadline Stipulation), (ii)  
25 provided that the Challenge Deadline would not be extended as to the Acknowledged Collateral, but  
26 (iii) otherwise extended the Challenge Deadline to February 11, 2019 (the “Extended Challenge  
27 Deadline”) as it related to any assets of the Debtors other than the Acknowledged Collateral.  
28



1 **UMB Bank, N.A., as trustee**

2  
3 By:   
4 Daniel S. Bleck  
5 Paul J. Ricotta  
6 Ian A. Hammel  
7 Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
8 Counsel to UMB Bank, N.A.

9 **Official Committee of Unsecured Creditors**

10  
11 By: /AA  
12 Gregory A. Bray  
13 Mark Shinderman  
14 James C. Behrens  
15 Milbank, Tweed, Hadley & McCloy LLP  
16 Counsel to the Official Committee of Unsecured Creditors  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28