

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

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

Judge: Hon. Ernest M. Robles

**STIPULATION BETWEEN DEBTOR, ST.  
VINCENT MEDICAL CENTER, AND DAVID  
PULLMAN, GRANTING DAVID PULLMAN  
RELIEF FROM THE AUTOMATIC STAY**

**Hearing:**

DATE: March 18, 2019  
TIME: 10:00 a.m.  
PLACE: Roybal Federal Building  
255 E. Temple Street/Ctrm 1568  
Los Angeles, CA 90012

- ☐ 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 DePaul Ventures, LLC
- ☐ Affects DePaul Ventures - San Jose  
Dialysis, LLC

Debtors and Debtors In Possession.

This Stipulation is entered into by and between the debtor, St. Vincent Medical Center,  
debtor and debtor in possession in these procedurally consolidated cases, and Movant, David

DENTONS US LLP  
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LOS ANGELES, CALIFORNIA 90017-5704  
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LOS ANGELES, CALIFORNIA 90017-5704  
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1 Pullman, stipulating to relief from the automatic stay so that Mr. Pullman may proceed with his  
2 litigation filed in the Superior Court in Los Angeles County, based on the following facts:

3 A. On August 31, 2018, the Debtors each filed a voluntary petition for relief under  
4 chapter 11. Since the commencement of their cases, the Debtors have been operating their  
5 businesses as debtors in possession pursuant to §§ 1107 and 1108.

6 B. Debtor VHS, a California nonprofit public benefit corporation, is the sole  
7 corporate member of the following five Debtor California nonprofit public benefit corporations  
8 that operate six acute care hospitals: O'Connor Hospital, Saint Louise Regional Hospital,  
9 St. Francis, St. Vincent Medical Center, Seton Medical Center, and Seton Medical Center  
10 Coastside and other facilities in the state of California. Seton Medical Center and Seton Medical  
11 Center Coastside operate under one consolidated acute care license. Declaration Of Richard G.  
12 Adcock [Docket No. 8] ("First-Day Decl."), at 4, ¶ 11.

13 C. VHS, the Hospitals, and their affiliated entities operate as a nonprofit health care  
14 system, with approximately 1,680 inpatient beds, six active emergency rooms, a trauma center,  
15 eleven medical office buildings, and a host of medical specialties, including tertiary and  
16 quaternary care. First-Day Decl., at 4, ¶ 12.

17 D. On September 17, 2018, the Office of the United States Trustee appointed an  
18 Official Committee of Unsecured Creditors in these cases. [Docket No. 197.]

19 E. On October 13, 2015, David Pullman filed a Complaint against St. Vincent  
20 Medical Center, among others, for medical malpractice, in the Superior Court of the State of  
21 California for the County of Los Angeles, Case No. BC 597684. A First Amended Complaint  
22 was filed on January 27, 2017.

23 F. St. Vincent Medical Center filed an Answer on August 5, 2016. An Answer to the  
24 First Amended Complaint was filed on March 22, 2017.

25 G. On February 23, 2019, David Pullman filed a Motion For Relief From The  
26 Automatic Stay, in which Motion Mr. Pullman *seeks recovery only from applicable insurance,*  
27 *and waives any deficiency or other claim against the Debtor or property of the Debtor's*  
28 *bankruptcy estate.*

1 H. Mr. Pullman is not seeking and will not seek damages that are not covered by  
2 insurance.

3 I. The parties agree that relief from stay will not be effective until March 15, 2019.

4 WHEREFORE, St. Vincent Medical Center and David Pullman stipulate that Mr. Pullman  
5 may have relief from the automatic stay as of March 15, 2019, on the basis that he will seek  
6 recovery only from applicable insurance, he will not seek damages that are not covered by  
7 insurance, and he waives any deficiency or other claim against the Debtor or property of the  
8 Debtors' bankruptcy estates.

9 Dated: March 12, 2019

DENTONS US LLP  
SAMUEL R. MAIZEL  
JOHN A. MOE, II  
TANIA R. MOYRON

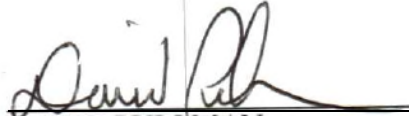
10  
11  
12 By 

JOHN A. MOE, II

Attorneys for the Debtors

13  
14 Dated: March 12, 2019

DAVID PULLMAN

15  
16 

DAVID PULLMAN,  
On Behalf Of Himself

DENTONS US LLP  
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