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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  
Dialysis, LLC

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. Judge Ernest M. Robles

**DEBTORS' RESPONSE TO MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY  
FILED ON BEHALF OF EBTISSAN SALEH,  
ET AL. [DOCKET NO. 1842]**

Hearing:

DATE: April \_\_, 2019

TIME: 10:00 a.m.

PLACE: Courtroom 1568

Roybal Federal Building

255 East Temple Street

Los Angeles, California 90012



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Verity Health System of California, Inc., and St. Francis Medical Center (“St. Francis”), debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), hereby respond to the *Motion For Relief From Stay* (the “Motion”) filed on behalf of Ebtissam Saleh, Lmes Khanafer, Fatimah Khanafer, Rana Khanafer, Rim Khanafer, and Hussein Khanafer (the “Movants”) [Docket No. 1842].

The Motion seeks relief from the automatic stay so that a case pending in the Superior Court in Los Angeles, LASC Case No. BC718838, may proceed to adjudication. According to the Motion, Movant (i) asserts a tort claim against the Debtors, (ii) seeks recovery only from applicable insurance, if any, and (iii) waives any deficiency or other claim against the Debtors or property of the Debtors’ bankruptcy estates.

The Debtors would not normally oppose the Motion because the Plaintiffs only seek recovery from applicable insurance, if any, and waive any deficiency.

However, in this case after being served with a Notice Of Stay on October 19, 2018 [*see*, attached Exhibit “A”], *the Plaintiffs engaged in a willful violation of the Stay by filing a Second Amended Complaint against St. Francis on January 8, 2019* [*see*, pages 12-16 of Plaintiffs’ Motion]. This willful violation of the stay should not be permitted and an appropriate sanction is to deny the Motion. The Court should not reward Plaintiffs’ violation of the stay.

Debtors request the Motion be denied.

Dated: March 22, 2019

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By: /s/John A. Moe, II  
JOHN A. MOE, II

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Possession