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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.

- ☒ 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

**STIPULATION CONTINUING HEARING RE
OBJECTION OF CIGNA ENTITIES TO NOTICE
TO COUNTERPARTIES TO EXECUTORY
CONTRACTS AND UNEXPIRED LEASES OF
THE DEBTORS THAT MAY BE ASSUMED AND
ASSIGNED [RELATED TO DKT. NOS. 1704, 1850]**

Continued Hearing:

Date: June 5, 2019

Time: 10:00 a.m.

Place: United States Bankruptcy Court
Courtroom 1568
255 East Temple Street
Los Angeles, California 90012

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300



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1 This stipulation is entered between Verity Health System of California, Inc. and the above-
2 referenced affiliated debtors, the debtors and debtors in possession in the above-captioned chapter
3 11 bankruptcy case (collectively, the “Debtors”), on the one hand, and Cigna Healthcare of
4 California, Inc., Cigna Health and Life Insurance Company, and Life Insurance Company of North
5 America (collectively, “Cigna”), on the other, in the above-captioned jointly administered cases
6 with respect to the following:
7

8 1. On February 19, 2019, the Court entered its *Order (1) Approving Form Of Asset*
9 *Purchase Agreement For Stalking Horse Bidder And For Prospective Overbidders, (2) Approving*
10 *Auction Sale Format, Bidding Procedures And Stalking Horse Bid Protections, (3) Approving*
11 *Form Of Notice To Be Provided To Interested Parties, (4) Scheduling A Court Hearing To*
12 *Consider Approval Of The Sale To The Highest Bidder, And (5) Approving Procedures Related To*
13 *The Assumption Of Certain Executory Contracts And Unexpired Leases; And (II) An Order (A)*
14 *Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances*
15 [Docket No. 1572] the (“Bidding Procedures Order”).

16 2. On March 5, 2019, the Debtors filed a *Notice of Counterparties to Executory*
17 *Contracts and Unexpired Leases of the Debtors That May Be Assumed and Assigned* [Docket No.
18 1704].

19 3. On March 20, 2019, Cigna filed the *Objection of Cigna Entities to Notice to*
20 *Counterparties to Executory Contracts and Unexpired Leases of the Debtors That May Be*
21 *Assumed and Assigned* [Docket No. 1850] (the “Cigna Objection”).

22 4. The Bidding Procedures Order provides that the Court will hold a hearing to
23 consider the sale on April 17, 2019, at 10:00 a.m. (Pacific Time) (the “Hearing Date”).

24 5. Cigna and the Debtors have discussed issues concerning the assumption and
25 assignment of the Cigna Contracts (as defined in the Cigna Objection), and the Debtors have
26 agreed to continue the Hearing Date to allow additional time to negotiate a resolution of the Cigna
27 Objection.
28

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

2 A. The Hearing Date to consider the Cigna Objection shall be continued from April
3 17, 2019, at 10:00 a.m., to June 5, 2019, at 10:00 a.m. (Pacific Time). For the avoidance of doubt,
4 this Stipulation does not affect the other matters on calendar at the Sale Hearing. Any order
5 entered approving the sale will not approve the assumption and assignment of the Cigna Contracts.
6 All arguments asserted in the Cigna Objection are preserved.

7 B. The deadline for the Debtors to reply to the Cigna Objection is extended to May 29,
8 2019, at 4:00 p.m. (PST).

9
10 **Verity Health System of California, Inc. et al.**

11 DATED: April 15, 2019

DENTONS US LLP

12
13 By: /s/ Tania M. Moyron

Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

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15
16 **Cigna Healthcare of California, Inc., Cigna Health
and Life Insurance Company, and Life Insurance Company of North America**

17 DATED: April 15, 2019

CONNOLLY GALLAGHER LLP

18
19 By: 

Jeffrey C. Wisler

Counsel to Cigna Healthcare of California, Inc.,
Cigna Health and Life Insurance Company, and
Life Insurance Company of North America

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