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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

**STIPULATION CONTINUING HEARING RE  
OBJECTION OF SCAN HEALTH PLAN TO  
ASSUMPTION AND ASSIGNMENT OF SCAN  
HEALTH PLAN AGREEMENTS [RELATED TO  
DKT. NOS. 1572, 1704, 2162]**

**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 SCAN Health Plan  
4 (“SCAN”), on the other, in the above-captioned jointly administered cases with respect to the  
5 following:  
6

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

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

18 3. On April 12, 2019, SCAN filed the *Objection of SCAN Health Plan to Assumption*  
19 *and Assignment of SCAN Health Plan Agreements* [Docket No. 2162] (the “SCAN Objection”).

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

22 5. SCAN and the Debtors have discussed issues concerning the assumption and  
23 assignment of certain SCAN agreements, and the Debtors have agreed to continue the Hearing  
24 Date to allow additional time to negotiate a resolution of the SCAN Objection.

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

26 A. The Hearing Date to consider the SCAN Objection shall be continued from April  
27 17, 2019, at 10:00 a.m., to June 5, 2019, at 10:00 a.m. (Pacific Time). For the avoidance of doubt,  
28 this Stipulation does not affect the other matters on calendar at the Sale Hearing. Any order

1 entered approving the sale will not approve the assumption and assignment of the SCAN  
2 agreements. All arguments asserted in the SCAN Objection are preserved.

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

5  
6 **Verity Health System of California, Inc. et al.**

7 DATED: April 15, 2019

DENTONS US LLP

8  
9 By: /s/ Tania M. Moyron

Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

10  
11  
12 **SCAN Health Plan**

13 DATED: April 15, 2019

LOEB & LOEB LLP

14 By: 

Daniel B. Besikof

Lisa E. Rubin

Counsel to SCAN Health Plan