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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 PHILIPS MEDICAL CAPITAL**

[RELATED TO DKT. NO. 1933]

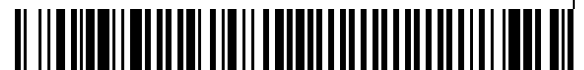
Continued Hearing:

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
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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 Philips Medical Capital
4 (“Philips”), on the other, in the above-captioned jointly administered cases with respect to the
5 following:

6 1. On March 28, 2019, Philips filed its *Motion for Order Fixing Time for Assumption*
7 *or Rejection of Executory Contract and for Performance of all Obligations Required under the*
8 *Lease Agreements or Rejection of Lease* [Docket No. 1932] (the “Objection”) regarding a Master
9 Lease Agreement and First Amendment to Master Lease Agreement that was attached to the
10 Objection (collectively the “Master Lease”). Philips set the Objection for hearing on April 24,
11 2019, at 10:00 a.m. PST (the “Philips Hearing Date”).

12 2. On April 10, 2019, the Debtors filed their *Memorandum in Support of Entry of an*
13 *Order: (A) Authorizing the Sale of Property Free and Clear of all Claims, Liens and*
14 *Encumbrances; (B) Authorizing the Assumption and Assignment of Designated Executory*
15 *Contracts and Unexpired Leases; and (C) Granting Related Relief* [Docket No. 2115] (the “Sale
16 Motion”).

17 3. On April 11, 2019, the Debtors filed a *Notice of Executory Contracts and*
18 *Unexpired Leases Designated by Strategic Global Management, Inc. for Assumption and*
19 *Assignment* [Docket No. 2131] which listed the Master Lease as an agreement to be assumed and
20 assigned in the pending sale between the Debtors and Strategic Global Management, Inc. *Id.* at
21 63, l. 930.

22 4. On April 17, 2019, the Court issued its ruling concerning the Sale Motion and held
23 that, for contracts “to which counterparties have asserted an objection with respect to adequate
24 assurance of future performance and/or the appropriate cure amount; adjudication of the
25 assumption and assignment of such contracts shall occur on June 5, 2019, at 10:00 a.m.” [Docket
26 No. 2221].

1 5. Philips and the Debtors have continued discussions regarding assumption and cure
2 amounts related to the Master Lease, and the Debtors have agreed to continue the Hearing Date
3 regarding the Objection.

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

5 A. The Hearing Date to consider the Objection shall be continued from April 24, 2019,
6 at 10:00 a.m., to June 5, 2019, at 10:00 a.m. (PST).

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

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

10 DATED: April 22, 2019

DENTONS US LLP

11
12 By: /s/ Tania M. Moyron

Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

13
14 **Philips Medical Capital**

15
16 DATED: April 22, 2019

GLASS & GOLDBERG

17 By: Marshall F. Goldberg

Marshall F. Goldberg

Counsel to Philips Medical Capital

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