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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.

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. Ernest M. Robles

**DECLARATION OF TANIA M. MOYRON RE
DEBTORS' SECOND MOTION FOR ENTRY OF
AN ORDER PURSUANT TO § 365(D)(4) OF THE
BANKRUPTCY CODE EXTENDING THE TIME
TO ASSUME OR REJECT UNEXPIRED LEASES
OF NONRESIDENTIAL REAL PROPERTY**

**[RELATES TO DOCKET NOS. 1955, 2247, 2248,
2269]**

[No Hearing Required]

Debtors and Debtors In Possession.

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DECLARATION OF TANIA M. MOYRON

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2 1. I am an attorney duly licensed to practice before the above-entitled Court, and am a
3 partner at Dentons US LLP, counsel for Verity Health System of California, Inc., and the above-
4 referenced affiliated debtors (collectively, the “Debtors”), the debtors and debtors in possession in
5 the above-captioned chapter 11 bankruptcy cases.

6 2. On March 29, 2019, the Debtors filed their *Second Motion For Entry Of An Order*
7 *Pursuant To § 365(d)(4) Of The Bankruptcy Code Extending The Time To Assume Or Reject*
8 *Unexpired Leases Of Nonresidential Real Property* [Docket No. 1955], which sought to extend the
9 Debtors’ deadline to assume or reject real-property, non-residential leases (the “Assumption
10 Rejection Deadline”) from March 29, 2019, to June 27, 2019.

11 3. On April 23, 2019, the Court issued a tentative ruling on the Motion [Docket No.
12 2247] (the “Tentative Ruling”) and stated that:

13 The Court is prepared to extend the Assumption/Rejection Deadline
14 to June 27, 2019, provided that no Lessors object after having
15 received proper notice of the Motion. The Court will deem a
16 Lessor’s non-opposition to constitute “consent” for purposes of [11
17 U.S.C.] § 365(d)(4)(B)(ii). Absent extension of the deadline, the
18 Debtors will lack the ability to assume and assign any of the leases
19 at issue to Strategic Global Management (“SGM”). This would
20 require SGM to renegotiate the leases, making it more difficult for
21 SGM to consummate the sale that was recently approved by the
22 Court.

23 By no later than April 24, 2019, the Debtors shall serve upon the
24 Lessors notice that unless a Lessor objects, the Court intends to
25 extend the Assumption/Rejection Deadline to June 27, 2019 ... The
26 notice shall be accompanied by copies of the Motion and this
27 tentative ruling. The deadline for the Lessors to object shall be May
28 8, 2019. In the event that no objection is filed, the Debtors shall
submit a declaration so attesting, accompanied by a proposed order
granting the Motion. In the event that an objection is filed, the Court
will determine whether a further hearing is required, and will notify
the parties accordingly.

24 4. Pursuant to the Tentative Ruling, the Debtors filed their *Notice of Second Motion*
25 *For Entry Of An Order Pursuant To § 365(d)(4) Of The Bankruptcy Code Extending The Time To*
26 *Assume Or Reject Unexpired Leases Of Nonresidential Real Property* [Docket No. 2248] (the
27 “Notice”). The Notice attached the Motion and Tentative Ruling and notified Lessors (as defined
28

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1 in the Tentative Ruling) of their objection deadline and the fact that a failure to object would be
2 deemed to be consent to the Motion.

3 5. On April 26, 2019, Travis R. Buckingham, on behalf of the Debtors' claims and
4 noticing agent, Kurtzman Carson Consultants, LLC ("KCC") submitted a *Declaration of Service*
5 *by Kurtzman Carson Consultants, LLC Regarding Docket Numbers 2246, 2248, 2254 and 2255*
6 [Docket No. 2269] stating that KCC had served the Notice, the Motion and the Tentative Ruling
7 on the Lessors.

8 6. No objections were filed to the Motion by the deadline of May 8, 2019 set in the
9 Tentative Ruling.

10 7. Pursuant to the Tentative Ruling, the Debtors are concurrently lodging a form of
11 order granting the Motion, which is also attached hereto as Exhibit "A."

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed this 14th day of May, 2019 in Los Angeles, California.

15
16 /s/ Tania M. Moyron

TANIA M. MOYRON

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EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

In re
VERITY HEALTH SYSTEM OF, INC.,
et al.,
Debtors and Debtors In Possession.

☒ Affects All Debtors
☐ Affects Verity Health System of
California, Inc. CALIFORNIA
☐ 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
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Case No. 2:18-bk-20179-ER
Case No. 2:18-bk-20180-ER
Case No. 2:18-bk-20181-ER

Hon. Judge Ernest M. Robles
Chapter 11 Cases

**ORDER GRANTING DEBTORS' SECOND
MOTION FOR ENTRY OF AN ORDER
PURSUANT TO § 365(d)(4) OF THE
BANKRUPTCY CODE EXTENDING THE
TIME TO ASSUME OR REJECT UNEXPIRED
LEASES OF NONRESIDENTIAL REAL
PROPERTY**

[Relates to Docket Nos. 1955, 2247, 2248, 2269]

Hearing:

Date: April 23, 2019
Time: 10:00 a.m.
Place: Courtroom 1568
225 E. Temple Street
Los Angeles, CA 90012

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1 Upon consideration of the *Debtors' Second Motion for Entry of an Order Pursuant to §*
2 *365(d)(4) of the Bankruptcy Code Extending the Time to Assume or Reject Unexpired Leases of*
3 *Nonresidential Real Property* [Docket No. 1955] (the "Motion") filed by Verity Health System of
4 California, Inc., and the above-referenced affiliated debtors and debtors in possession in the
5 above-captioned chapter 11 bankruptcy cases (the "Debtors"), the *Notice of Second Motion For*
6 *Entry Of An Order Pursuant To § 365(d)(4) Of The Bankruptcy Code Extending The Time To*
7 *Assume Or Reject Unexpired Leases Of Nonresidential Real Property* [Docket No. 2248], the
8 *Declaration of Service by Kurtzman Carson Consultants, LLC Regarding Docket Numbers 2246,*
9 *2248, 2254 and 2255* [Docket No. 2269], and no objections or oppositions having been filed, it
10 further appearing that notice of the Motion was proper; and for the reasons set forth in the Court's
11 tentative ruling on the Motion (the "Tentative Ruling") [Docket No. 2248], which the Court
12 adopts as its final ruling and which is incorporated herein by reference; and good and sufficient
13 cause having been shown,

14 IT IS HEREBY ORDERED:

- 15 1. The Motion is granted in its entirety.
- 16 2. The Debtors' Assumption and Rejection Deadline (defined in the Tentative Ruling)
- 17 shall be June 27, 2019.

18 IT IS SO ORDERED.

19 ###