

SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Tel: (213) 623-9300 / Fax: (213) 623-9924

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 AND EXTENDING
OBJECTION DEADLINE FOR NANTWORKS, LLC AND
NANTHEALTH, INC. RE ORDER (1) APPROVING FORM OF ASSET
PURCHASE AGREEMENT FOR STALKING HORSE BIDDER AND
FOR PROSPECTIVE OVERBIDDERS, (2) APPROVING AUCTION
SALE FORMAT, BIDDING PROCEDURES AND STALKING HORSE
BID PROTECTIONS [RELATES TO DOCKET NO. 1572, 2128, 2157]

Continued Hearing:

Date: July 10, 2019

Time: 10:00 a.m.

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



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1 This stipulation is entered between the above-captioned debtors and debtors in possession
2 (the “Debtors”), on the one hand, and NantWorks, LLC and NantHealth, Inc. (together, the
3 “Counterparties”), on the other, in the above-captioned jointly administered cases with respect to
4 the following:

5 1. On February 19, 2019, the Court entered its *Order (1) Approving Form Of Asset*
6 *Purchase Agreement For Stalking Horse Bidder And For Prospective Overbidders, (2) Approving*
7 *Auction Sale Format, Bidding Procedures And Stalking Horse Bid Protections, (3) Approving*
8 *Form Of Notice To Be Provided To Interested Parties, (4) Scheduling A Court Hearing To*
9 *Consider Approval Of The Sale To The Highest Bidder, And (5) Approving Procedures Related To*
10 *The Assumption Of Certain Executory Contracts And Unexpired Leases; And (II) An Order (A)*
11 *Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances*
12 [Docket No. 1572] the (“Bidding Procedures Order”), which set a deadline for counterparties to
13 executory contracts and unexpired leases to object to the cure amounts, identified by the Debtors,
14 on or before March 22, 2019, at 4:00 p.m. (PST) (the “Objection Deadline”).

15 2. On March 22, 2019, the Court approved an extension of the Objection Deadline for
16 the Counterparties to March 29, 2019, at 4:00 p.m. [Docket No. 1886].

17 3. On April 1, 2019, the Court approved an extension of the Objection Deadline for
18 the Counterparties to April 5, 2019, at 4:00 p.m. [Docket No. 1968].

19 4. On April 9, 2019, the Court approved an extension of the Objection Deadline for
20 the Counterparties to April 10, 2019, at 4:00 p.m. [Docket No. 2098].

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

23 6. On April 11, 2019, the Court approved an extension of the Objection Deadline for
24 the Counterparties to May 22, 2019, and continued the Hearing Date to June 5, 2019, at 10:00 a.m.
25 (Pacific Time) [Docket No. 2128].

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

7. On April 12, 2019, NantHealth, Inc. filed the *Objection Of NantHealth, Inc. To Proposed Assumption And Assignment Of Executory Contracts And Unexpired Leases* [Docket No. 2157] (the “NantHealth Objection”).

8. On April 15, 2019, NantHealth, Inc. and the Debtors filed the *Stipulation Continuing Hearing Re Objection Of NantHealth, Inc. To Proposed Assumption And Assignment Of Executory Contracts And Unexpired Leases* [Docket No. 2208], which the Court approved on April 16, 2019 [Docket No. 2218], continuing the Hearing Date with respect to the NantHealth Objection to June 5, 2019.

9. The Counterparties and the Debtors have continued in discussions regarding cure amounts and assumption and assignment related to executory contracts and unexpired leases, and the Debtors have agreed to further extend the Objection Deadline to allow additional time to review and reconcile such amounts.

10. The Counterparties and the Debtors have also agreed to continue the Hearing Date as to the NantHealth Objection and any objection or supplemental objection that will be filed by the Counterparties to July 10, 2019.

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

A. The Hearing Date shall be continued from June 5, 2019, at 10:00 a.m. to July 10, 2019, at 10:00 a.m. (Pacific Time).

B. The Objection Deadline for the Counterparties shall be continued to June 26, 2019, at 4:00 (PST).

C. The deadline for the Debtors to reply to any objection filed by the Counterparties is July 3, 2019, at 4:00 (PST).

Verity Health System of California, Inc. et al.

DATED: May 22, 2019

DENTONS US LLP

By: /s/ Tania M. Moyron

Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

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NantWorks, LLC

DATED: May 22, 2019

JONES DAY

By: Ben Rosenblum
Benjamin Rosenblum
Counsel to NantWorks, LLC *PP WJS*

NantHealth, Inc.

DATED: May 22, 2019

JONES DAY

By: Ben Rosenblum
Benjamin Rosenblum
Counsel to NantHealth, Inc. *PP WJS*

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