

SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
JOHN A. MOE, II (Bar No. 066893)
john.moe@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.

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

- ☒ 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 DePaul Ventures, LLC
☐ Affects DePaul Ventures - San Jose Dialysis, LLC

Debtors and Debtors In Possession.

Chapter 11 Cases

Judge: Hon. Ernest M. Robles

**EXECUTED DECLARATION IN
SUPPORT OF THE RETENTION OF
NEWLY SELECTED ORDINARY
COURSE PROFESSIONAL RE MOTION
AUTHORIZING THE DEBTORS TO
RETAIN AND COMPENSATE
PROFESSIONALS UTILIZED BY THE
DEBTORS IN THE ORDINARY COURSE
OF BUSINESS**

DATE: October 24, 2018
TIME: 10:00 a.m.
PLACE: Courtroom 1568

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
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1 On October 1, 2018, Verity Health System of California, Inc. and the above-referenced
2 affiliated debtors, debtors and debtors in possession in the above-captioned administratively
3 consolidated chapter 11 bankruptcy cases (collectively, the “Debtors”) filed the *Motion For An*
4 *Order Authorizing The Debtors To Retain And Compensate Professionals Utilized By The*
5 *Debtors In The Ordinary Course Of Business* (the “Motion”) [Docket No. 364]. The Court
6 granted the Motion, and an order approving the Motion was entered October 29, 2018 [Docket
7 No. 693].

8 The Debtor hereby files the attached Declaration in support of the retention of newly
9 selected Ordinary Course Professional The Fromholz Firm.

10
11 Dated: May 20, 2019

DENTONS US LLP
SAMUEL R. MAIZEL
JOHN A. MOE, II
TANIA R. MOYRON

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14 By /s/John A. Moe, II
JOHN A. MOE, II

15 Attorneys for the Debtors
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Case No. 2:18-bk-20180-ER
Case No. 2:18-bk-20181-ER

Chapter 11 Cases

Judge: Hon. Ernest M. Robles

**DISCLOSURE DECLARATION OF ANN
FROMHOLZ IN SUPPORT OF
RETENTION OF THE FROMHOLZ
FIRM AS AN ORDINARY COURSE
PROFESSIONAL**

DENTONS US LLP
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1 I, Ann Haley Fromholz, hereby declare that the following is true to the best of my
2 knowledge, information and belief.

3 1. I am a sole proprietor of The Fromholz Firm (the “Firm”), which maintains offices
4 at 177 East Colorado Boulevard, Suite 200, Pasadena, California 91105-1955.

5 2. This Declaration is submitted in connection with an Order of the United States
6 Bankruptcy Court for the Central District of California, Los Angeles Division dated October 29,
7 2018 [Docket No. 693], authorizing the above-captioned debtor and debtor in possession (the
8 “Debtor”) to retain certain professionals in the ordinary course of business during the pendency of
9 the Debtor’s chapter 11 cases, effective as of the Petition Date.

10 3. The Firm, through me, and members of the firm, have represented and advised the
11 Debtors as workplace investigator with the following aspects of the Debtors’ businesses or legal
12 affairs: The Firm has conducted investigations into internal complaints of harassment,
13 discrimination, and retaliation, since October 2018. The fees incurred were \$4,160.00. That fee
14 was paid before I understood I had to first be employed as an Ordinary Course Professional.

15 4. The Debtors have requested, and the Firm has agreed, to continue to provide
16 services to the Debtors pursuant to section 327(b) of chapter 11 of title 11 of the United States
17 Code (the “Bankruptcy Code”) with respect to such matters. More specifically, the Debtors have
18 requested, and the Firm proposes to render, the following services to the Debtors on which I have
19 not commenced work: Two workplace investigations into two separate claims of discrimination
20 and harassment. One investigation is at the Ocean View location. The second investigation is at
21 St. Francis. Because of the work I previously performed, I ask that my employment be approved
22 *nunc pro tunc* as of October 1, 2018.

23 5. The Firm’s current customary hourly rates, subject to change from time to time,
24 are \$400 for Ann Fromholz, \$300 for junior lawyers, and \$200 for non-lawyer professionals.

25 6. The Firm understands the maximum monthly fee payable to the Firm as an
26 Ordinary Course Professional is \$12,000 per month on a “rolling basis,” and that any amount
27 above the “Cap Amount” could only be paid upon the filing and granting of an Application under
28 sections 330 and 331 of the Bankruptcy Code.

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7. To the best of my knowledge, formed after due inquiry, neither I, the Firm, nor any employee thereof has any connection with the Debtors or currently represents any creditors, other parties-in-interest, the United States Trustee or any person employed by the Office of the United States Trustee with respect to the matters upon which it is to be engaged, and the Firm does not, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors, hold or represent any interest adverse to the Debtors, the estate or any class of creditors or equity interest holders, except other than amounts due the Firm set forth below.

8. In addition, although unascertainable at this time after due inquiry, the Firm may have in the past represented, currently represent, and may in the future represent entities that are claimants of the Debtors in matters entirely unrelated to the Debtors and the Estates. The Firm does not and will not represent any such entity in connection with these pending chapter 11 cases and does not have any relationship with any such entity, attorneys or accountants that would be adverse to the Debtors or the Estates.

9. The Firm's process of ascertaining what, if any, connection it may have with any interest adverse to the Debtors, the Estates or any class of creditors or equity interest holders, consists of the following: review of the Debtors' top 50 list of general unsecured creditors and the Debtors' list of creditors asserting secured claims.

10. In light of the foregoing, I believe that the Firm does not hold or represent any interest materially adverse to the Debtors, the estate, creditors, or equity interest holders, as identified to the Firm, with respect to the matters in which the firm will be engaged.

11. Except as set forth herein, no promises have been received by the Firm or any partner, associate or other professional thereof as to compensation in connection with these chapter 11 cases other than in accordance with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rule"), the Local Rules of the United States Bankruptcy Court for the Central District of California ("LBR"), and orders of this Court.

12. The Firm further states that it has not shared, nor agreed to share any compensation received in connection with this chapter 11 case with another party or person, other than as permitted by section 504(b) of the Bankruptcy Code and Bankruptcy Rule 2016.

1 13. The foregoing constitutes the statement of the Firm pursuant to sections 329 and
2 504 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016(b).

3 I declare under penalty of perjury under the laws of the United States of America, that the
4 foregoing is true and correct.

5 Executed this 17th day of May, 2019, at Pasadena, California.

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8 ANN FROMHOLZ
9 THE FROMHOLZ FIRM
10 177 EAST COLORADO BOULEVARD, SUITE 200
11 PASADENA, CALIFORNIA 91105-1955
12 TELEPHONE NO.: 626.568.8005
13 FACSIMILE: 626.671.8514
14 E-MAIL: ANN@LAWTHATWORKS.COM

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601 SOUTH FIGUEROA STREET, SUITE 2500
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