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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. Ernest M. Robles

**DEBTORS' RESPONSE AND OPPOSITION TO
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY FILED ON BEHALF OF
CHRISTOPHER STEELE [DOCKET NO. 2474];
DECLARATION OF ANDRES A. ESTRADA**

Hearing:

DATE: June 24, 2019

TIME: 10:00 a.m.

PLACE: Courtroom 1568

255 East Temple Street
Los Angeles, California 90012-3300



Debtors Verity Health System of California, Inc. (“VHS”) and Saint Louise Regional Hospital (“St. Louise”), debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases, together with debtors O’Connor Hospital, St. Francis Medical Center, St. Vincent Medical Center and Seton Medical Center (collectively, with VHS and St. Louise, the “Debtors”), hereby respond to the *Motion For Relief From Stay* (the “Motion”) filed on behalf of Christopher Steele (the “Movant”) [Docket No. 2474].

I.

INTRODUCTION

The Motion must be denied insofar as it seeks relief from stay to adjudicate the amount of a claim that the Movant then intends to assert against the Debtors, because the time for the Movant to file a Proof of Claim has expired, and the Movant did not file a claim. Granting relief from the stay would be a meaningless act because Mr. Steele can no longer assert a claim.

The Motion also seeks relief from stay so that the Movant can obtain discovery from the Debtors in regard to the Plaintiff’s allegations against other Defendants, and apparently in regard to allegations against VHS and St. Louise. VHS and St. Louise understand that they must respond to discovery directed to causes of action against other Defendants. However, the automatic stay should remain in place in order to prevent the Movant from seeking discovery directed at obtaining a judgment against VHS and/or St. Louise on a claim which is barred.

If the Court nonetheless considers granting relief, the Debtors oppose such relief because the Debtors are not prepared at this time to respond to the litigation demands, when the Debtors’ focus is upon completing work on the sale of two hospitals and obtaining approval of a sale of the remaining four hospitals, and, subsequently, working toward developing a mechanism for the payment of claims in these cases.

II.

STATEMENT OF RELEVANT FACTS

A. Brief Description Of The Debtors’ Businesses And The Bankruptcy Cases

1. On August 31, 2018 (“Petition Date”), VHS and the sixteen affiliated debtors, debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases each filed a

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1 voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “Cases”). By entry of
2 an order, the Cases are being jointly administered before the Bankruptcy Court. [Docket No. 17].
3 Since the commencement of the Cases, the debtors have been operating their businesses as debtors
4 in possession pursuant to §§ 1107 and 1108.

5 2. On August 31, 2018, this Court entered an order authorizing the joint administra-
6 tion of the Cases pursuant to Bankruptcy Rule 1015(b) and LBR 1015-1 and 9013-1(q).

7 3. VHS, a California nonprofit public benefit corporation, is the sole corporate
8 member of five Debtor California nonprofit public benefit corporations that operated O’Connor
9 Hospital and Saint Louise Regional Hospital, and currently operates St. Francis Medical Center,
10 St. Vincent Medical Center, and Seton Medical Center, including Seton Medical Center Coastsides
11 Campus (collectively, the “Hospitals”) -- and other facilities in the state of California.

12 4. As of the date of the voluntary petitions were filed, VHS, the Hospitals and their
13 affiliated entities operated as a nonprofit health care system with approximately 1,680 inpatient
14 beds, six active emergency rooms, a trauma center, eleven medical office buildings, and a host of
15 medical specialties, including tertiary and quaternary care. *Declaration Of Richard G. Adcock In*
16 *Support of Emergency First-Day Motions*, at 4, 12 (the “First Day Declaration”) [Docket No. 8].
17 On the Petition Date, the Debtors had approximately 850 inpatients. *Id.*, at 6, 17. The scope of
18 the services provided by the Verity Health System is exemplified by the fact that in 2017, the
19 Hospitals provided medical services to over 50,000 inpatients and approximately 480,000
20 outpatients. *Id.*, at 4, 12.

21 5. A detailed description of the Debtors’ businesses, capital structure, and the events
22 leading to the commencement of these Cases is contained in the First Day Declaration.

23 6. On September 17, 2018, the U.S. Trustee appointed a statutory creditors’
24 committee pursuant to § 1102 (the “Committee”).

25 7. No trustee or examiner has been appointed in these Cases.

26 **B. The Sale Of Assets**

27 8. This Court is fully informed on the Debtors’ work to complete sales of the Debtors’
28 six hospitals, exemplified by the following Motions and Orders:

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- The Debtors' Notice Of Motion And Motion For The Entry Of (I) An Order (1) Approving Form Of Asset Purchase Agreement For Stalking Horse Bidder And For Prospective Overbidders To Use, (2) Approving Auction Sale Format, Bidding Procedures And Stalking Horse Bid Protections, (3) Approving Form Of Notice To Be Provided To Interested Parties, (4) Scheduling A Court Hearing To Consider Approval Of The Sale To The Highest Bidder And (5) Approving Procedures Related To The Assumption Of Certain Executory Contracts And Unexpired Leases; And (II) An Order (A) Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances; Memorandum Of Points And Authorities In Support Thereof [Docket No. 365];
- The Order (A) Authorizing The Sale Of Certain Of The Debtors' Assets To Santa Clara County Free And Clear Of Liens, Claims, Encumbrances, And Other Interests; (B) Approving The Assumption And Assignment Of An Unexpired Lease Related Thereto; And (C) Granting Related Relief [Docket No. 1153];
- The Debtors' Notice Of Motion And Motion For The Entry Of (I) An 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; (3) Approving Form Of Notice To Be Provided To Interested Parties; (4) Scheduling A Court Hearing To Consider Approval Of The Sale To The Highest Bidder; And (5) Approving Procedures Related To The Assumption Of Certain Executory Contracts And Unexpired Leases; And (II) An Order (A) Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances; Memorandum Of Points And Authorities In Support Thereof [Docket No. 1279];
- The 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, (3) Approving Form Of Notice To Be Provided To Interested Parties, (4) Scheduling A Court Hearing To

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1 *Consider Approval Of The Sale To The Highest Bidder And (5) Approving Proce-*
2 *dures Related To The Assumption Of Certain Executory Contracts And Unexpired*
3 *Leases; And (II) An Order (A) Authorizing The Sale Of Property Free And Clear*
4 *Of All Claims, Liens And Encumbrances; Memorandum Of Points And Authorities*
5 *In Support Thereof* [Docket No. 1572]; and

- 6 • *The Order (A) Authorizing The Sale Of Certain Of The Debtors' Assets To Strate-*
7 *gic Global Management, Inc. Free And Clear Of Liens, Claims, Encumbrances,*
8 *And Other Interests; (B) Approving The Assumption And Assignment Of An Unex-*
9 *pired Lease Related Thereto; And (C) Granting Related Relief* [Docket No. 2306],

10 9. More specifically, on December 27, 2018, the Court entered an Order [Docket
11 No. 1153] approving Santa Clara County as the purchaser for the Debtors' two hospitals in Santa
12 Clara County -- Saint Louise Medical Center and O'Connor Hospital -- and related assets at a
13 price of approximately \$235 million, with the sale closing on February 28, 2019 (the "Santa Clara
14 Sale").

15 10. On February 19, 2019, the Court entered an Order approving bidding procedures
16 and a stalking horse bidder for the Debtors remaining four hospitals— St. Francis Medical Center,
17 St. Vincent Medical Center, Seton Medical Center and Seton Medical Center Coastsides Campus—
18 and set a sale hearing for April 17, 2019. [Docket Nos. 1279, 1572]. The proposed asset purchase
19 agreement entered into between certain Debtors (VHS, Verity Holdings, LLC, St. Francis Medical
20 Center, St. Vincent Medical Center, St. Vincent Dialysis Center and Seton Medical Center) and
21 Strategic Global Management, Inc. (the "APA") [Docket No. 1279, Exhibit 1] has an outside
22 closing date of December 31, 2019. APA § 9.1.

23 11. On April 17, 2019, the Court approved the sale of St. Francis Medical Center,
24 St. Vincent Medical Center, St. Vincent Dialysis Center, Seton Medical Center and Seton Medical
25 Center Coastsides to Strategic Global Management Inc. On May 2, 2019, the Court entered its
26 Order approving that sale [Docket No. 2306].

27 12. In addition to being fully engaged in the sale of the Hospitals (including completion
28 of the sale of St. Louise), the Debtors also are engaged in an array of other tasks, including the

Debtors' focus on patient care and satisfying all of the administrative requirements required by the Bankruptcy Code and the United States Trustee.

C. Facts Relevant to the Motion and the Claims Bar Date

13. The Motion seeks relief from the automatic stay so that a Complaint filed July 11, 2018, in the Santa Clara County Superior Court, Case No. 18CV331350, can proceed to adjudication. The Court is requested to take judicial notice of the conformed, file-stamped copy of the Complaint, which is attached as **Exhibit "A."** According to the Motion and the Complaint, the Movant asserts tort claims against St. Louise and, according to the Motion, "seeks recovery primarily from third parties... except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501..."¹

14. As set forth in the attached Declaration of Andres A. Estrada ("Estrada Declaration"), on September 14, 2018, Christopher Steele was given notice of the commencement of the bankruptcy cases. Estrada Declaration, ¶ 4. A copy of the *Notice Of Case Commencement* is attached as **Exhibit "B."**

15. On February 19, 2019, Mr. Steele was given notice of the Bar Date in regard to the last day to file proofs of claim, which was April 1, 2019. Estrada Declaration, ¶ 5. A copy of the *Notice Of Bar Date* is attached as **Exhibit "C."**

16. The *Notice Of Bar Date* was also published (i) on March 1, 2019, in the Los Angeles *Times*, San Francisco *Chronicle*, San Jose *Mercury News*, and (ii) on March 4, 2019 in *USA Today*. Estrada Declaration, ¶¶ 6-7.

17. A *Notice Of Stay* was filed in the Superior Court case on September 10, 2018 [*see Supplemental Declaration of Nathaniel Leeds*, Docket No. 2474-3, page 2, ¶ 6.] A conformed, file-stamped copy of the *Notice Of Stay* is attached as **Exhibit "D."**

18. Schedules were filed in connection with VHS and St. Louise, and the Steele claim is listed as "disputed," "unliquidated," "contingent" and the amount as "unknown." Copies of the

¹ The Motion also seeks to preserve the right to file "an adversary complaint under 11 U.S.C. § 523 or 727 in this bankruptcy case." The Complaint asserts no cause of action that is nondischargeable.

1 pertinent Schedules filed in these bankruptcy cases, identifying the Steele claim, are attached as
2 **Exhibit “E.”**

3 **III.**

4 **ARGUMENT IN OPPOSITION TO MOTION**

5 Whether stay relief should be granted or denied is committed to the sound discretion of the
6 Bankruptcy Court. *Benedor Corp. v. Conejo Enterprises, Inc. (In re Conejo Enterprises, Inc.)*, 96
7 F.3d 346 (9th Cir. 1996). Upon a showing of “cause,” a bankruptcy court shall grant relief from
8 the automatic stay. *Id.* at 352. “Cause” has no clear definition and is determined on a case-by-
9 case basis. *Id.*

10 **A. “Cause” Does Not Exist To Grant The Motion**

11 There is no cause here, because Mr. Steele has no ability to assert a claim against any of
12 the Debtors because the date by which he had to assert a claim has long since passed. The
13 Schedules listed his claim as disputed and at \$0.00. With his claim scheduled as “unliquidated,”
14 “contingent,” “disputed” and “unknown,” and having been given notice of the Bar Date, he was
15 required to file a Proof of Claim. He did not do so. *In re Sitzberger*, 65 B.R. 256, 260 (Bankr.
16 S.D. Cal. 1986) (“the claims bar date [is] akin to a statute of limitations [for claims in a
17 bankruptcy]”); *Esoimeme v. United Airlines, Inc.*, 369 B.R. 531, 533, 535-536 (N.D. Cal. 2007)
18 (“Because plaintiff’s claim against defendant arose prior to defendant’s filing for bankruptcy,
19 plaintiff was required to file a proof of claim form with the bankruptcy court to preserve his claim.
20 He failed to do so despite receiving formal notice. “When a creditor such as plaintiff ‘fails to file a
21 proof of claim within the prescribed time limit, his claims are discharged by confirmation of a
22 reorganization plan.”) (citing *In re Maya Constr. Co.*, 78 F.3d 1395, 1399 (9th Cir.1996) (citing
23 11 U.S.C. § 1141(d)(1)(A))); *In re Schepps Food Stores, Inc.*, 152 B.R. 136, 141 (Bankr. S.D.
24 Tex. 1993) (“The notice requirements were met once the debtor correctly addressed, stamped and
25 mailed the Notice of Bar Date to each of the creditors and none of the notices were returned.
26 These creditors have failed to present sufficient evidence to rebut the presumption that proper
27 notice was given”); and *In re De la Cruz*, 176 B.R. 19, 22 (B.A.P. 9th Cir. 1994) (claim asserted
28

1 after bar date is barred unless motion for extension of time is filed beforehand or notice was not
2 received of bar date).

3 Accordingly, the Motion -- insofar as it seeks relief from stay to obtain a judgment against
4 VHS and/or St. Louise, or to obtain discovery in order to try and obtain entry of judgment against
5 VHS and/or St. Louise -- should be denied.

6 **B. The Motion Should Not Be Granted Because The Motion Does Not Meet The**
7 **Required Standards**

8 Courts typically look at twelve nonexclusive factors to determine whether the stay should
9 be lifted (the “*Plumberex* factors”). See *Truebro, Inc. v. Plumberex Specialty Products, Inc. (In re*
10 *Plumberex Specialty Products, Inc.)*, 311 B.R. 551, 559 (Bankr. C.D. Cal. 2004). These factors
11 include: (1) whether the relief will result in a partial or complete resolution of the issues; (2) the
12 lack of any connection with or interference with the bankruptcy case; (3) whether the foreign pro-
13 ceeding involves the debtor as a fiduciary; (4) whether a specialized tribunal has been established
14 to hear the particular cause of action and whether that tribunal has the expertise to hear such cases;
15 (5) whether the debtor’s insurance carrier has assumed full financial responsibility for defending
16 the litigation; (6) whether the action essentially involves third parties, and the debtor functions
17 only as a bailee or conduit for the goods or proceeds in question; (7) whether the litigation in
18 another forum would prejudice the interests of other creditors, the creditors’ committee and other
19 interested parties; (8) whether the judgment claim arising from the foreign proceeding would
20 result in a judicial lien avoidable by the Debtor under section 522(f); (9) whether movant’s success
21 in the foreign proceeding would result in a judicial lien avoidable by the debtor under section
22 522(f); (10) the interests of judicial economy and the expeditious economical determination of
23 litigation for the parties; (11) whether the foreign proceedings have progressed to the point where
24 the parties are prepared for trial; and (12) the impact of the stay on the parties and the “balance of
25 hurt.”

26 Here, many of the *Plumberex* factors weigh in favor of denial of the Motion, including the
27 fact that the interests of judicial economy weigh heavily in favor of denying the Motion. As
28 already explained, relief from stay will provide no basis for recovery for Mr. Steele because, if he

1 were to obtain a judgment against VHS or St. Louise, he would not share in a dividend because he
2 filed no claim. What would be the point of granting relief from stay in order to adjudicate a claim
3 on which there can be no recovery?

4 Second, permitting Mr. Steele to pursue a claim in the Superior Court -- on which he
5 cannot recover because he did not timely file any claim -- would interfere with the bankruptcy
6 case at a time when the Debtors must focus on the sale of their hospitals.

7 Although this bankruptcy case is only ten months old, the Debtors have moved and are
8 moving with alacrity on sales of all six operating Hospitals and related entities, as explained in the
9 two Motions cited hereinabove [Docket Nos. 365 and 1279] and three Orders [Docket Nos. 1153,
10 1572 and 2306]. Allowing the State Court Action to proceed would be detrimental to the Debtors'
11 prospects for success at this *critical point* in the Bankruptcy Case. Bankruptcy courts have found
12 that granting relief from the automatic stay is inappropriate in situations such as the present case,
13 where *the debtor is required to focus its attention on the substantial actions which must be taken*
14 *to ensure a successful conclusion. In re Curtis*, 40 B.R. 795, 806 (Bankr. D. Utah 1984) ("The
15 most important factor in determining whether to grant relief from the automatic stay to permit
16 litigation against the debtor in another forum is the effect of such litigation on the administration
17 of the estate. Even slight interference with the administration may be enough to preclude relief in
18 the absence of a commensurate benefit." *Truebro*, 311 B.R. at 561 (relief from stay denied where
19 "[i]t is undeniable that the federal district court action is connected to, and would interfere with the
20 bankruptcy case"). *Crocker National Bank v. American Mariner Industries (In re American*
21 *Mariner)*, 27 B.R. 1004, 1014 (BAP 9th Cir. 1984), reversed on other grounds ("The policy of the
22 code, in the litigation involving the automatic stay, particularly in a Chapter 11 or reorganization
23 setting, is to place matters in a holding pattern so as to permit an opportunity, where there are
24 prospects for survival, for time to allow the reorganization to develop for the benefit of the debtor
25 and its creditors"). It is well established that the "reorganization" of a debtor may include cases
26 where the debtor sells all or substantially all of its assets pre-confirmation under section 363 or
27 pursuant to confirmation of a plan of reorganization that results in the liquidation of the debtor's
28 assets. *See, e.g.*, 11 USC § 1123(a)(5)(D) (allowing plans of reorganization that provide for the

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1 sale of any or all of the debtor's property); 11 USC § 1141(d)(3) (a corporate debtor will not
2 receive a discharge if the plan calls for a liquidation of substantially all of the debtor's assets); *see*
3 *generally* Ali M.M. Mojdehi & Janet Dean Gertz, *The Implicit Good Faith Requirement in*
4 *Chapter 11 Liquidations: A Rule in Search of a Rationale*, 14 Am. Bankr. Inst. L. Rev. 143, 153
5 (2006) ("section 363 sales of the entire business have become quite common in chapter 11").

6 Other *Plumberex* factors weigh in favor of the Debtors and against granting the Movant's
7 Motion For Relief From Stay:

- 8 • The Movant is not willing to limit recovery to insurance.
- 9 • There is no specialized tribunal involved in this case; in fact, bankruptcy courts
- 10 routinely determine unliquidated and disputed claims.
- 11 • There is no reason to believe that these claims will be resolved speedily and
- 12 effectively in the pending litigation.
- 13 • There is no fiduciary duty claim being asserted by the Movant against St. Louise.

14 If the Court were nonetheless to grant the Motion, the Debtors request that relief not be
15 effective until after September 1st so that they can retain their focus on the sales.

16 **IV.**

17 **CONCLUSION**

18 The Motion should be denied, insofar as the Motion seeks relief from the automatic stay to
19 pursue entry of a judgment against VHS and/or St. Louise, and insofar as the Motion seeks to
20 obtain discovery from VHS and/or St. Louise for the purpose of obtaining entry of a judgment
21 against VHS and/or St. Louise.

22
23 Dated: June 10, 2019

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

24
25
26 By /s/John A. Moe, II
JOHN A. MOE, II

27 Attorneys for the Chapter 11 Debtors and
28 Debtors In Possession

DECLARATION OF ANDRES A. ESTRADA

I, Andres A. Estrada, declare that, if called as a witness, I would and could competently testify thereto, of my own personal knowledge, as follows.

1. I am a Senior Managing Consultant at Kurtzman Carson Consultants, LLC (“KCC”), the claims and noticing agent for Verity Health System of California, Inc. (“VHS”) and the above-referenced affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), in the referenced chapter 11 bankruptcy cases (the “Chapter 11 Cases”).

2. I submit this declaration (“Declaration”) in support of the *Debtors’ Response And Opposition To Motion For Relief From The Automatic Stay Filed On Behalf Of Christopher Steele* [Docket No. 2474] (the “Motion”). All capitalized terms not defined herein have the meaning ascribed to them in the Motion.

3. Except as otherwise indicated herein, this Declaration is based upon my personal knowledge, my review of relevant documents, information provided to me by KCC and employees of the Debtors or the Debtors’ legal and financial advisors, or my opinion based upon my experience, knowledge, and information concerning the Debtors’ operations and the bankruptcy claims service industry. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

4. KCC served Mr. Steele on September 14, 2018, with a *Notice Of Case Commencement Of Chapter 11 Cases and Meeting of Creditors Pursuant to Section 341 Of The Bankruptcy Code* [Docket No. 185], a copy of which is attached as **Exhibit “B”** hereto.

5. KCC served Mr. Steele on February 19, 2019, with the *Notice Of Bar Date For Filing Proofs Of Claims And Interest* [Docket No. 1544], a copy of which is attached as **Exhibit “C”** hereto.

6. The Notice of Case Commencement and Notice of Bar Date were served on Mr. Steele at the following locations:

- Christopher Steele, 1904 Exchange Drive, Macon, Georgia 31210

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- Christopher Steele, Nathaniel Leeds, Brent & Fiol LLP, 1000 Fourth Street, Suite 750, San Rafael, California 94901

7. Additionally, the Bar Date Notice was (i) published on March 1, 2019, in the Los Angeles *Times*, San Francisco *Chronicle*, San Jose *Mercury News*, and (ii) published on March 4, 2019 in *USA Today*.

8. The Bar Date Notice was also posted on the KCC website on the Important Date, Deadlines & Documents section of the website with a link to the order and remains there at www.kccclcc.net/verityhealth.

9. I also attach as **Exhibit “D”** a conformed, file-stamped copy of the *Notice Of Stay* filed in the Superior Court case in which Mr. Steele filed his Complaint.

10. I have reviewed the Schedule of Claims filed in behalf of VHS and St. Louise Regional Hospital, and Christopher Steele’s claims are listed as “disputed,” “contingent,” “unliquidated” and “unknown.” Copies of the pertinent Schedules for VHS and St. Louise showing the Steele claim are attached as **Exhibit “E.”**

11. I have reviewed the claims filed in the Debtors’ cases and cannot find a Proof of Claim filed for Christopher Steele.

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

Executed this 10th day of June, 2019, at El Segundo, California.


Andres A. Estrada

LIST OF EXHIBITS

Exhibit A	Complaint in behalf of Christopher Steele against Verity Health System of California, Inc., and Saint Louise Regional Hospital, filed July 11, 2018, in the Superior Court of the State of California for the County of Santa Clara, Case No. 18CV331350
Exhibit B	Notice of Case Commencement of Chapter 11 Cases and Meeting of Creditors Pursuant to Section 341 of the Bankruptcy Code
Exhibit C	Notice of Bar Date for Filing of Proofs of Claims and Interests
Exhibit D	Notice Of Stay of Proceedings, filed in the Superior Court of the State of California for the County of Santa Clara, Case No. 18CV331350
Exhibit E	Part of the Schedules filed in the Bankruptcy Cases of Verity Health System, Inc., and Saint Louise Regional Hospital, identifying Contingent, Unliquidated, Disputed and Unknown Claim of Christopher Steele

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Exhibit A

Superior Court of California

County of Santa Clara



Case Number : 18CV331350

Copy Request: 117531

Request Type: Case Documents

Prepared for: jONATHAN

Number of documents: 1

Number of pages: 4

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Clerk of Court
Superior Court of CA,
County of Santa Clara
18CV331350
Reviewed By: E. Fang

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Nathaniel Leeds [SBN: 246138] Brent & Fiol, LLP 1000 Fourth Street, Ste. 750 San Rafael, CA 94901 TELEPHONE NO: 415-839-8370 FAX NO. (Optional): 415-373-4420 E-MAIL ADDRESS (Optional): nleeds@bfplawyers.com ATTORNEY FOR (Name): Christopher Steele		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 191 N 1st Street MAILING ADDRESS: CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME:		
PLAINTIFF: Christopher Steele DEFENDANT: Jeremy Orvik, Arezou Minooee, Rodney Wong, John Saranto, Julia Jung, Verity Health Systems of California, Inc., St. Louise Regional Hospital <input checked="" type="checkbox"/> DOES 1 TO 40		
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):		
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER: 18CV331350

1. Plaintiff (name or names): Christopher Steele
alleges causes of action against defendant (name or names): Jeremy Orvik, Arezou Minooee, Rodney Wong, John Saranto, Julia Jung, Verity Health Systems of California, Inc., St. Louise Regional Hospital
2. This pleading, including attachments and exhibits, consists of the following number of pages:
3. Each plaintiff named above is a competent adult
 - a. ☐ except plaintiff (name):
 - (1) ☐ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ a public entity (describe):
 - (4) ☐ a minor ☐ an adult
 - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) ☐ other (specify):
 - (5) ☐ other (specify):
 - b. ☐ except plaintiff (name):
 - (1) ☐ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ a public entity (describe):
 - (4) ☐ a minor ☐ an adult
 - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) ☐ other (specify):
 - (5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

PLD-PI-001

SHORT TITLE:

Steele v. Jeremy Orvik, et al., Does 1 to 40

CASE NUMBER:

4. ☐ Plaintiff (name):

Is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a. ☒ except defendant (name): Verity Health Systems c. ☐ except defendant (name):

(1) ☐ a business organization, form unknown

(2) ☒ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

(1) ☐ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

b. ☒ except defendant (name): St. Louise Reg Hosp. d. ☐ except defendant (name):

(1) ☒ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

(1) ☐ a business organization, form unknown

(2) ☐ a corporation

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

a. ☒ Doe defendants (specify Doe numbers): 1-20 were the agents or employees of other named defendants and acted within the scope of that agency or employment.

b. ☒ Doe defendants (specify Doe numbers): 21-40 are persons whose capacities are unknown to plaintiff.

7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

a. ☐ at least one defendant now resides in its jurisdictional area.

b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.

d. ☐ other (specify):

9. ☒ Plaintiff is required to comply with a claims statute, and

a. ☒ has complied with applicable claims statutes, or

b. ☐ is excused from complying because (specify):

PLD-PI-001

SHORT TITLE:

Steele v. Jeremy Orvik, et al., Does 1 to 40

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☐ Motor Vehicle
- b. ☐ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (*specify*):

Medical Negligence

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☐ other damage (*specify*):

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ In the amount of: \$

15. ☐ The paragraphs of this complaint alleged on Information and belief are as follows (*specify paragraph numbers*):

Date: July 11, 2018

Nathaniel M. Leeds

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(2)

SHORT TITLE:

Steele v. J. Orvik, et al., Does 1 to 40

CASE NUMBER:

FIRST

(number)

CAUSE OF ACTION—General Negligence

Page 4

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Christopher Steele

alleges that defendant (name): All Named Defendants

☒ Does 1 to 40

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date):

at (place):

(description of reasons for liability):

On the evening of 4/13/17 Mr. Steele was brought to the Emergency Department at St. Louise Regional Hospital, which is owned and operated by Verity Health Systems of California. People who suffer crush injuries are at a high risk for compartment syndrome. Radiology indicated multiple fractures to Mr. Steele's right leg and swelling. Under the standard of care, Mr. Steele required an immediate orthopedic or surgical consultation, monitoring for compartment syndrome, and an assessment for potential vascular/arterial injuries. Defendants ER doctor Jeremy Orvik, ER physician's assistant Julia Jung, and hospitalist Arazou Minooee did not promptly assess Mr. Steele for compartment syndrome, did not immediately consult an orthopedist or surgeon, and did not assess whether Mr. Steele had suffered a vascular/arterial injury. Under the standard of care this workup should have been done before Arazou Minooee agreed to admit Mr. Steele to the hospital. Upon admission, Arazou Minooee the standard of care required that she promptly evaluate the patient and written order to nursing staff to monitor Mr. Steele's legs. She did neither. It was not until the following morning (more than 11 hours after Mr. Steele initially arrived) that orthopedist Raymond Wong, and trauma surgeon John Saranto were contacted to see Mr. Steele. At the time Wong and Saranto saw Mr. Steele he was showing further signs which were concerning for a vascular/arterial injury. The standard of care required that they assess that injury before surgery, and transfer if they cannot provide definitive treatment. By the time Wong and Saranto learned of Mr. Steele's focal occlusion of the right popliteal artery and transferred him to another hospital for definitive care, the leg could not be salvaged. As a direct and proximate result of the above negligence Mr. Steele suffered an avoidable amputation of his right leg.

Page 1 of 1

Exhibit B

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Proposed 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

**NOTICE OF CASE COMMENCEMENT
OF CHAPTER 11 CASES AND MEETING
OF CREDITORS PURSUANT TO
SECTION 341 OF THE BANKRUPTCY
CODE**

TO ALL INTERESTED PARTIES:

COMMENCEMENT OF CASES: On August 31, 2018, the entities listed below (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et. seq.* (the “Bankruptcy Code”), with the United States Bankruptcy Court for the Central District of California (Los Angeles Division) (the “Court”), and an order for relief has been entered. The Debtors’ chapter 11 cases (collectively, the “Cases”) are being jointly administered under Case No. 2:18-bk-20151-ER. You may be a creditor of one of the Debtors.

THIS NOTICE LISTS IMPORTANT DEADLINES. You may want to consult an attorney to protect your rights. All documents filed in these Cases may be inspected at the Office of the Claims and Noticing Agent at the address listed below:

Debtor	Address	Case No.	Tax ID No.
Verity Health System of California, Inc.	2040 East Mariposa Ave. El Segundo, CA	2:18-BK-20151-ER	91-2145484
O’Connor Hospital	2105 Forrest Ave. San Jose, CA 95128	2:18-BK-20168-ER	91-2154436
Saint Louise Regional Hospital	9400 No Name Uno Gilroy, CA 95020	2:18-BK-20162-ER	91-2154437
St. Francis Medical Center	3630 East Imperial Hwy Lynwood, CA 90262	2:18-BK-20165-ER	91-2154439
St. Vincent Medical Center	2131 West Third Street Los Angeles, CA 90057	2:18-BK-20164-ER	91-2154438
Seton Medical Center	1900 Sullivan Ave. Daly City, CA 94105	2:18-BK-20167-ER	91-2154441
O’Connor Hospital Foundation	2105 Forrest Ave. San Jose, CA 95128	2:18-BK-20179-ER	770006295
Saint Louise Regional Hospital Foundation	9400 No Name Uno Gilroy, CA 95020	2:18-BK-20172-ER	56-2384735
St. Francis Medical Center of Lynwood Foundation	3630 East Imperial Hwy Lynwood, CA 90262	2:18-BK-20178-ER	95-3190773
St. Vincent Foundation	2131 West Third Street Los Angeles, CA 90057	2:18-BK-20180-ER	95-3922511
St. Vincent Dialysis Center, Inc.	201 South Alvarado, Suite 220 Los Angeles, CA 90057	2:18-BK-20171-ER	953749293

1	Seton Medical Center Foundation	1900 Sullivan Ave. Daly City, CA 94105	2:18-BK-20175-ER	94-2824033
2				
3	Verity Business Services	2040 East Mariposa Ave. El Segundo, CA	2:18-BK-20173-ER	51-0659139
4				
5	Verity Medical Foundation	400 Race Street San Jose, CA	2:18-BK-20169-ER	45-3691852
6				
7	Verity Holdings, LLC	2040 East Mariposa Ave. El Segundo, CA	2:18-BK-20163-ER	81-3038177
8				
9	De Paul Ventures, LLC	203 Redwood Shores Pkwy, Ste 800 Redwood City, CA 94065	2:18-BK-20176-ER	27-3340398
10				
11	De Paul Ventures – San Jose Dialysis, LLC	203 Redwood Shores Pkwy, Ste 800 Redwood City, CA 94065	2:18-BK-20181-ER	37-1732430
12				

PURPOSE OF CHAPTER 11 FILING: Chapter 11 of the Bankruptcy Code enables a debtor to reorganize or liquidate pursuant to a plan of reorganization. A plan is not effective unless approved by the Court at a confirmation hearing. Creditors will be given notice concerning any plan and will be given notice if this case is dismissed or converted to another chapter of the Bankruptcy Code. The Debtors will remain in possession of their property and will continue to operate their business unless a trustee is appointed. No motion to appoint a trustee has been filed at this time. Creditors may be sent a copy of the plan and a disclosure statement describing the plan. Creditors may have the opportunity to vote on the plan. Creditors will be sent notice of the date of the confirmation hearing and may object to confirmation of the plan and attend the confirmation hearing.

CREDITORS MAY NOT TAKE CERTAIN ACTIONS: A creditor is anyone to whom the Debtors owe money or property. Under the Bankruptcy Code, the Debtors are granted certain protection against creditors. Common examples of prohibited actions by creditors include contacting the Debtors to demand repayment, taking action against the Debtors to collect money owed to creditors or to take property of the Debtors and starting or continuing foreclosure actions, repossessions or wage deductions. If unauthorized actions are taken against the Debtors, the Court may penalize the creditor who takes them. A creditor who is considering taking action against the Debtors or property of the Debtors should review section 362 of the Bankruptcy Code and may wish to seek legal advice.

MEETING OF CREDITORS: The Debtors' representative, as specified in Federal Rule of Bankruptcy Procedure 9001(5), is required to appear at a meeting of creditors on the date and at the place set forth below for the purpose of being examined under oath. Attendance by creditors at the meeting is welcomed, but not required. At the meeting, creditors may examine the Debtors' representative. The meeting may be continued or adjourned from time to time by notice at the meeting, without further written notice to creditors.

DATE, TIME AND LOCATION OF MEETING OF CREDITORS

Date: October 12, 2018

Location: St. Vincent Hospital
Seton Auditorium
2131 West Third Street
Los Angeles, CA 90057

Time: 9:30 a.m.

PROOF OF CLAIM: Schedules of creditors will be filed pursuant to Federal Rule of Bankruptcy Procedure 1007, and the Debtors will seek an order of the Court establishing procedures for the filing of proofs of claim. A proof of claim is a signed statement describing a creditor's claim. Any creditor holding a scheduled claim that is not listed as disputed, contingent or unliquidated as to amount may, but is not required to, file a proof of claim in these cases. Creditors whose claims are not scheduled or whose claims are listed as disputed, contingent or unliquidated as to amount and who desire to participate in these cases or share in any distribution must file their proofs of claim. A creditor who desires to rely on the schedules of creditors has the responsibility for determining that the claim is listed accurately.

A proof of claim may be filed at any time prior to the deadline established by the Court. No deadline has yet been established in these cases. When a deadline is established, all known creditors will receive notice of the deadline, along with a proof of claim form indicating how their claim is scheduled and instructions for completing and filing a proof of claim. Proof of claim forms are also available in the office of the clerk of the court of any bankruptcy court. Kurtzman Carson Consultants LLC is the claims agent in these cases. The place to request a proof of claim form from the Claims Agent is 2335 Alaska Avenue, El Segundo, California 90245. You will be notified by separate notice when and where to file a proof of claim.

PLEASE DO NOT FILE OR MAIL ANY PROOFS OF CLAIM OR OTHER DOCUMENTATION, INCLUDING CORRESPONDENCE CONCERNING A CLAIM, WITH OR TO ANYONE, INCLUDING THE BANKRUPTCY COURT, THE UNITED STATES TRUSTEE AND/OR THE UNDERSIGNED COUNSEL, UNTIL YOU ARE INSTRUCTED WHEN AND WHERE TO FILE A PROOF OF CLAIM

DISCHARGE OF DEBTS: Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your claim. See section 1141(d) of the Bankruptcy Code. A discharge means that you may never try to collect your claim from any of the Debtors, except as provided in the plan.

NOTICE: You will not receive notice of all documents filed in these cases. All documents filed with the Court, including schedules of the Debtors' property and debts, will be available for inspection at the office of the clerk of the court. Since this case is governed by the Local Bankruptcy Rules regarding electronic means of filing, signing and verifying documents, the Court's docket sheet and documents filed electronically are also accessible at the Court's Internet site, www.nysb.uscourts.gov, through an account obtained from Pacer Service Center by dialing (800) 676-6856 (from the US) or (210) 301-6440 (from outside the US).

FURTHER INFORMATION: Further information concerning these chapter 11 cases may be obtained by calling (888) 249-2741 (from the US and Canada) or (310) 751-2605 (from outside

1 the US). The Claims Agent will also maintain a website, www.kccllc.net/verityhealth,
2 specifically for the Debtors' bankruptcy cases from which anyone may download the claims
3 register and obtain other relevant information and documents pertaining to the Debtors' cases at
no extra charge.

4 **LEGAL ADVICE:** The staff of the bankruptcy clerk's office cannot give legal advice. Consult a
5 lawyer to determine your rights in this case.

6 Dated: September 13, 2018

7 **DENTONS US LLP**
8 **SAMUEL R. MAIZEL**
9 **JOHN A MOE, II**
10 **TANIA M. MOYRON**

11 By: /s/Samuel R. Maizel
12 Samuel R. Maizel

13 Proposed Attorneys for
14 Debtors and Debtors in Possession
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DENTONS US LLP
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Exhibit C

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5
6 Attorneys for the Chapter 11 Debtors and
Debtors In Possession

7 **UNITED STATES BANKRUPTCY COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

9 In re:

10 VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,

11 Debtors and Debtors In
12 Possession.

- 13
- 14 ☒ Affects All Debtors
☐ Affects Verity Health System of
California, Inc.
15 ☐ Affects O'Connor Hospital
16 ☐ Affects Saint Louise Regional Hospital
☐ Affects St. Francis Medical Center
17 ☐ Affects St. Vincent Medical Center
☐ Affects Seton Medical Center
18 ☐ Affects O'Connor Hospital Foundation
☐ Affects Saint Louise Regional Hospital
Foundation
19 ☐ Affects St. Francis Medical Center of
Lynwood Foundation
20 ☐ Affects St. Vincent Foundation
21 ☐ Affects St. Vincent Dialysis Center, Inc.
☐ Affects Seton Medical Center
Foundation
22 ☐ Affects Verity Business Services
23 ☐ Affects Verity Medical Foundation
☐ Affects Verity Holdings, LLC
24 ☐ Affects De Paul Ventures, LLC
25 ☐ Affects De Paul Ventures - San Jose
Dialysis, LLC

26 Debtors and Debtors In Possession.
27
28

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
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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

**NOTICE OF BAR DATE FOR FILING PROOFS
OF CLAIMS AND INTERESTS**

BAR DATE: APRIL 1, 2019

1 **TO ALL CREDITORS, EQUITY AND INTEREST HOLDERS, AND OTHER**
2 **PARTIES IN INTEREST:**

3 **NOTICE OF CLAIMS BAR DATE**

4 The Bankruptcy Court has set a deadline of April 1, 2019 for creditors and holders of
5 ownership interests in Verity Health System of California, Inc., a California nonprofit benefit
6 corporation and the Debtor herein, and the above-referenced affiliated debtors, the debtors and
7 debtors in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the
8 "Debtors"), to file proofs of claim against, or proofs of interest in, the Debtors' estates.

9 The exceptions to this deadline for filing proofs of claims or interest are: (1) claims arising
10 from rejection of executory contracts or unexpired leases; (2) claims of governmental units; and (3)
11 claims arising as the result of transfer avoidance pursuant to chapter 5 of the Bankruptcy Code.

12 Unless otherwise ordered by the Court, claims arising from (i) rejection of executory
13 contracts or unexpired leases pursuant to 11 U.S.C. § 365, (ii) rejection or modification of collective
14 bargaining agreements pursuant to 11 U.S.C. § 1113, (iii) voluntary termination of pension plans
15 under the Employee Retirement Income Security Act ("ERISA"), or (iv) withdrawal from a
16 multiemployer pension plan governed by ERISA, or (v) termination of retiree benefits, including
17 as may be required under 11 U.S.C. § 1114, the last day to file a proof of claim is: (a) 30 days after
18 the date of entry of the order authorizing such rejection, modification, voluntary termination or
19 withdrawal; or (b) April 1, 2019, whichever is later.

20 For claims of "governmental units," as that term is defined in 11 U.S.C. § 101(27), the last
21 day to file a proof of claim is: (a) 180 days after the entry the order for relief in this case; or (b)
22 April 1, 2019, whichever is later. 11 U.S.C. § 502(b)(9).

23 For administrative claims arising under Section 503(b)(9) of the Bankruptcy Code (a
24 "503(b)(9) Claim") on account of goods sold to the Debtors in the ordinary course of the Debtors'
25 business that were received by the Debtors within 20 days before the commencement of the
26 Debtors' cases, the last day to request allowance of such claims by filing a proof of claim and
27 indicating that the claim asserted is a 503(b)(9) Claim is the Bar Date, i.e. April 1, 2019.

28 For claims arising from the avoidance of a transfer under chapter 5 of the Bankruptcy Code,
the last day to file a proof of claim is: (a) 30 days after the entry of judgment avoiding the transfer;
or (b) April 1, 2019, whichever is later.

If you are listed on the Schedules of Assets and Liabilities of the Debtors and your claim or
interest is not scheduled as disputed, contingent, unliquidated or unknown, your claim or interest
is deemed filed in the amount set forth in the schedules, and filing of a proof of claim or interest is
unnecessary if you agree that the amount scheduled is correct and that the category in which your
claim or interest is scheduled (secured, unsecured, preferred stock, common stock, *etc.*) is correct.
11 U.S.C. § 1111(a).

If your claim or interest is not listed on the schedules or is scheduled as disputed, contingent,
unliquidated or unknown, or if you disagree with the amount or description scheduled for your
claim or interest, you must file a proof of claim or interest.

Notwithstanding any other provision of this Notice, any record or beneficial holder of those
certain California Statewide Communities Development Authority Revenue Bonds (Daughters of
Charity Health System) Series 2005 A, G and H, California Public Finance Authority Revenue

Notes (Verity Health System) Series 2015 A, B, C and D, California Public Finance Authority Revenue Notes (Verity Health System) Series 2017 A and B, or any master indenture obligation issued by the Debtors or any of them in connection with the foregoing (each an “Obligated Debt Security”) is not required to file any proof of claim for any claim that is (a) limited to the repayment of principal, interest, and other applicable fees and charges on account of an Obligated Debt Security, and (b) asserted against the Debtors O’Connor Hospital, St. Francis Medical Center, St. Vincent Medical Center, Saint Louise Regional Hospital, Seton Medical Center, and/or Verity Health Systems of California, Inc. (each a “Funded Debt Claim”). Notwithstanding the foregoing, (i) any record or beneficial holder of an Obligated Debt Security wishing to assert any other claim, including any claim other than a Funded Debt Claim is required to file proof(s) of claim in compliance with this Notice, unless another exception identified herein applies; and (ii) for the avoidance of doubt, the foregoing exclusion in this paragraph shall not apply to any indenture trustee or collateral agent described in the documents that evidence or secure any Obligated Debt Security.

Notwithstanding any other provisions of this Notice, any record or beneficial holder of those certain California Statewide Communities Development Authority (“CSCDA”) Bonds issued pursuant to the CSCDA CaliforniaFirst Program dated May 11, 2017 or May 18, 2017 (each a “Special Assessment Debt Security”) is not required to file any proof of claim for any claim that is (a) limited to the repayment of principal, interest, and other applicable fees and charges on account of a Special Assessment Debt Security and (b) asserted against the Debtor Seton Medical Center (a “Funded Assessment Claim”). Notwithstanding the foregoing, (i) any record or beneficial holder of a Special Assessment Debt Security wishing to assert any other claim, including any claim other than a Funded Assessment Claim is required to file proof(s) of claim in compliance with this Notice, unless another exception identified herein applies; and (ii) for the avoidance of doubt, the foregoing exclusion in this paragraph shall not apply to any indenture trustee or collateral agent described in the documents that evidence or secure any Special Assessment Debt Security.

Each indenture trustee or collateral agent for an Obligated Debt Security or a Special Assessment Debt Security is authorized to file such proof(s) of claim on behalf of itself and the beneficial and record holders of such Funded Debt Claims or Funded Assessment Claim against each relevant Debtor in compliance with this Notice and/or may in its sole discretion include or reference such documents that evidence or secure any Obligated Debt Security or Special Assessment Debt Security (and is excused from attaching copies of any referenced documents evidencing and/or securing those claims, so long as those materials remain available on request).

Failure of a creditor or interest holder to file timely a proof of claim or interest on or before the deadline may result in disallowance of the claim or interest or subordination under the terms of a plan of reorganization without further notice or hearing. 11 U.S.C. § 502(b)(9). Creditors and interest holders may wish to consult an attorney to protect their rights.

Dated: February 13, 2019

DENTONS US LLP

By: /s/ Samuel R. Maizel

Samuel R. Maizel

Tania M. Moyron

Attorneys for Chapter 11 Debtors and Debtors in Possession

In re Verity Health System of California, Inc., *et al.*
(Case No. 2:18-bk-20151-ER)

Attached is a blank Proof of Claim form for the above-captioned case (with instructions). Proof of interest forms, and additional copies of proof of claim forms, may be obtained from the Debtors' Claims and Noticing Agent, Kurtzman, Carson Consultants LLC ("KCC"), located at 2335 Alaska Avenue, El Segundo, CA 90245, (888) 249-2741, or by visiting KCC's website at <http://www.kccllc.net/verityhealth>.

Please be advised that all Proofs of Claim and Proofs of Interest, with all supporting documentation, must be submitted to KCC via mail or courier no later than April 1, 2019 at 5:00 p.m. (Pacific Time), at the following address:

Verity Claims Processing Center
c/o KCC
2335 Alaska Avenue
El Segundo, CA 90245

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

United States Bankruptcy Court for the Central District of California

Indicate Debtor against which you assert a claim by checking the appropriate box below **(Check only one Debtor per claim form.)**

- | | |
|--|---|
| <input type="checkbox"/> Verity Health System of California (Case No 18-20151) | <input type="checkbox"/> St Francis Medical Center of Lynwood Foundation (Case No 18-20178) |
| <input type="checkbox"/> De Paul Ventures – San Jose Dialysis, LLC (Case No 18-20181) | <input type="checkbox"/> St Louise Regional Hospital (Case No 18-20162) |
| <input type="checkbox"/> De Paul Ventures, LLC (Case No 18-20176) | <input type="checkbox"/> St Vincent Dialysis Center, Inc. (Case No 18-20171) |
| <input type="checkbox"/> O'Connor Hospital (Case No. 18-20168) | <input type="checkbox"/> St Vincent Foundation (Case No. 18-20180) |
| <input type="checkbox"/> O'Connor Hospital Foundation (Case No. 18-20179) | <input type="checkbox"/> St Vincent Medical Center (Case No. 18-20164) |
| <input type="checkbox"/> Saint Louise Regional Hospital Foundation (Case No. 18-20172) | <input type="checkbox"/> Verity Business Services (Case No. 18-20173) |
| <input type="checkbox"/> Seton Medical Center (Case No. 18-20167) | <input type="checkbox"/> Verity Holdings, LLC (Case No. 18-20163) |
| <input type="checkbox"/> Seton Medical Center Foundation (Case No. 18-20175) | <input type="checkbox"/> Verity Medical Foundation (Case No. 18-20169) |
| <input type="checkbox"/> St Francis Medical Center (Case No. 18-20165) | |

Official Form 410 Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. Who is the current creditor?	Name of the current creditor (the person or entity to be paid for this claim) _____ Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input type="checkbox"/> No <input type="checkbox"/> Yes From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name _____	Name _____
	Number _____ Street _____	Number _____ Street _____
	City _____ State _____ ZIP Code _____	City _____ State _____ ZIP Code _____
	Country _____	Country _____
	Contact phone _____	Contact phone _____
	Contact email _____	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input type="checkbox"/> Yes Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input type="checkbox"/> Yes Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim? \$ _____	Does this amount include interest or other charges? <input type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c) Limit disclosing information that is entitled to privacy, such as health care information _____
9. Is all or part of the claim secured?	<input type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☐ No

☐ Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date

MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name

First name

Middle name

Last name

Title

Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

Number

Street

City

State

ZIP Code

Country

Contact phone

Email

Official Form 410

Instructions for Proof of Claim

United States Bankruptcy Court

04/16

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.

- Fill in the caption at the top of the form

- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.

- Attach any supporting documents to this form.
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)

Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).

- Do not attach original documents because attachments may be destroyed after scanning.

- If the claim is based on delivery health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:

Verity Claims Processing Center
c/o KCC
2335 Alaska Avenue
El Segundo, CA 90245

- A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth. See Bankruptcy Rule 9037.

- For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent's website at <http://www.kccllc.net/verityhealth>.

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing that bankruptcy estate.
11 U.S.C. § 503

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity to who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Uniform claim identifier: An optional 24-character identifier that some creditors use to facilitate electronic payment.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Do not file these instructions with your form.

Exhibit D

CM-180

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address): Samuel R. Maizel SBN 189301 DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, CA 90017 TELEPHONE NO.: 213/623-9300 FAX NO. (Optional): 213/623-9924 E-MAIL ADDRESS (Optional): samuel.maizel@dentons.com ATTORNEY FOR (Name): St. Louise Regional Hospital		FOR COURT USE ONLY Electronically Filed by Superior Court of CA, County of Santa Clara, on 9/10/2018 4:10 PM Reviewed By: F. Miller Case #18CV331350 Envelope: 1927366
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 191 North First Street MAILING ADDRESS: CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME: Downtown Superior Court		
PLAINTIFF/PETITIONER: CHRISTOPHER STEELE, DEFENDANT/RESPONDENT: ST. LOUISE REGIONAL HOSPITAL,		
NOTICE OF STAY OF PROCEEDINGS		CASE NUMBER: 18CV331350 JUDGE: Elizabeth Strickland DEPT.:

To the court and to all parties:

1. Declarant (name): Samuel R. Maizel

- a. ☐ is ☐ the party ☒ the attorney for the party who requested or caused the stay.
- b. ☐ is ☐ the plaintiff or petitioner ☐ the attorney for the plaintiff or petitioner. The party who requested the stay has not appeared in this case or is not subject to the jurisdiction of this court.

2. This case is stayed as follows:

- a. ☐ With regard to all parties.
- b. ☒ With regard to the following parties (specify by name and party designation): St. Louise Regional Hospital; Verity Health System of California, Inc.

3. Reason for the stay:

- a. ☒ Automatic stay caused by a filing in another court. (Attach a copy of the Notice of Commencement of Case, the bankruptcy petition, or other document showing that the stay is in effect, and showing the court, case number, debtor, and petitioners.)
- b. ☐ Order of a federal court or of a higher California court. (Attach a copy of the court order.)
- c. ☐ Contractual arbitration under Code of Civil Procedure section 1281.4. (Attach a copy of the order directing arbitration.)
- d. ☐ Arbitration of attorney fees and costs under Business and Professions Code section 6201. (Attach a copy of the client's request for arbitration showing filing and service.)
- e. ☐ Other:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: September 7, 2018

Samuel R. Maizel

(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE)

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Central District of California
(State)

Case number (if known): Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.1. Debtor's name St. Louise Regional Hospital2. All other names debtor used
in the last 8 yearsInclude any assumed names,
trade names, and *doing business*
as names3. Debtor's federal Employer
Identification Number (EIN) 9 1 - 2 1 5 4 4 3 7

4. Debtor's address

Principal place of business

Mailing address, if different from principal place
of business9400 No Name Uno

Number Street

Number Street

Gilroy, California 95020

City State ZIP Code

P.O. Box

City State ZIP Code

Santa Clara

County

Location of principal assets, if different from
principal place of business

Number Street

City State ZIP Code

5. Debtor's website (URL) https://stlouise.verity.org

6. Type of debtor

- ☒
- Corporation (Including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
-
- ☐
- Partnership (excluding LLP)
-
- ☐
- Other. Specify: _____

Debtor

St. Louise Regional Hospital
Name

Case number (if known)

7. Describe debtor's business

A. Check one:

- ☒ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☐ None of the above

B. Check all that apply:

- ☒ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.naics.com/search/>.

6 2 2 1

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9
☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

☒ No

☐ Yes. District _____ When _____ Case number _____
MM / DD / YYYY
District _____ When _____ Case number _____
MM / DD / YYYY

If more than 2 cases, attach a separate list.

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

☐ No

☒ Yes. Debtor See attached list. Relationship _____
District _____ When _____
Case number, if known _____
MM / DD / YYYY

List all cases. If more than 1, attach a separate list.

Debtor

St. Louise Regional Hospital

Case number (if known)

11. Why is the case filed in this district?

Check all that apply:

- ☐ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☒ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

- ☒ No
- ☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____

Where is the property?

Number

Street

City

State

ZIP Code

Is the property insured?

- ☐ No
- ☐ Yes. Insurance agency _____

Contact name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

- ☐ 1-49 ☐ 1,000-5,000 ☐ 25,001-50,000
- ☐ 50-99 ☐ 5,001-10,000 ☐ 50,001-100,000
- ☐ 100-199 ☐ 10,001-25,000 ☐ More than 100,000
- ☒ 200-999

15. Estimated assets

- ☐ \$0-\$50,000 ☐ \$1,000,001-\$10 million ☐ \$500,000,001-\$1 billion
- ☐ \$50,001-\$100,000 ☒ \$10,000,001-\$50 million ☐ \$1,000,000,001-\$10 billion
- ☐ \$100,001-\$500,000 ☐ \$50,000,001-\$100 million ☐ \$10,000,000,001-\$50 billion
- ☐ \$500,001-\$1 million ☐ \$100,000,001-\$500 million ☐ More than \$50 billion

Debtor

St. Louise Regional Hospital

Case number (if known)

16. Estimated liabilities

- ☐ \$0-\$50,000
 ☐ \$1,000,001-\$10 million
 ☐ \$500,000,001-\$1 billion
- ☐ \$50,001-\$100,000
 ☐ \$10,000,001-\$50 million
 ☐ \$1,000,000,001-\$10 billion
- ☐ \$100,001-\$500,000
 ☐ \$50,000,001-\$100 million
 ☐ \$10,000,000,001-\$50 billion
- ☐ \$500,001-\$1 million
 ☒ \$100,000,001-\$500 million
 ☐ More than \$50 billion

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

- ☐ The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
- ☐ I have been authorized to file this petition on behalf of the debtor.
- ☐ I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/31/2018

MM/DD/YYYY

x

Signature of authorized representative of debtor

Richard Adcock

Printed name

Title Chief Executive Officer

18. Signature of attorney

x

Signature of attorney for debtor

Date 8/31/2018

MM/DD/YYYY

Samuel R. Maizel

Printed name

DENTONS US LLP

Firm name

601 South Figueroa Street, Suite 2500

Number Street

Los Angeles

City

CA

State

90017-5704

ZIP Code

(213) 623-9300

Contact phone

samuel.maizel@dentons.com

Email address

189301

Bar number

CA

State

Debtor

St. Louise Regional Hospital

Main Document

Page 5 of 21

Name

Fill in this information to identify your case:

United States Bankruptcy Court for the:
CENTRAL DISTRICT OF CALIFORNIA

Case number (if known)

Chapter 11

☐ Check if this an
amended filing

FORM 201. VOLUNTARY PETITION**Pending Bankruptcy Cases Attachment**

Debtor	O'Connor Hospital		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	O'Connor Hospital Foundation		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Verity Health Systems of California Inc.		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Saint Louise Regional Hospital Foundation		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Saint Francis Medical Center		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Saint Francis Medical Center of Lynwood Foundation		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Saint Vincent Medical Center		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Saint Vincent Foundation		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Saint Vincent Dialysis Center, Inc.		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Seton Medical Center and Seton Coastside		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Seton Medical Center Foundation		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Verity Business Services		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	Verity Medical Foundation		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	DePaul Ventures, LLC		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	
Debtor	DePaul Ventures - San Jose, ASC, LLC		Relationship to you	Affiliate
District	Central District of California	When August 2018	Case number, if known	

Debtor St. Louise Regional Hospital

Case number (if known)

Name _____

Fill in this information to identify your case:

United States Bankruptcy Court for the:

CENTRAL DISTRICT OF CALIFORNIA

Case number (if known)

Chapter 11

☐ Check If this an amended filing

FORM 201. VOLUNTARY PETITION

Pending Bankruptcy Cases Attachment - Continued

[illegible]

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address 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, CA 90017-5704 Tel.: (213) 623-9300 / Fax: (213) 623-9924	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Saint Louise Regional Hospital, Debtor(s).	CASE NO.: CHAPTER: 11 ATTACHMENT TO VOLUNTARY PETITION FOR NON-INDIVIDUAL FILING FOR BANKRUPTCY UNDER CHAPTER 11 <i>[If debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 and is requesting relief under chapter 11 of the Bankruptcy Code, this form shall be completed and attached to the petition.]</i>

1. If any of the Debtor's securities are registered under Section 12 of the Securities Exchange Act of 1934, the SEC file number is N/A.

2. The following financial data is the latest available information and refers to the debtor's condition on June 30, 2018.

- a. Total assets \$ 47,741,693.00
- b. Total debts (including debts listed in 2.c., below) \$ 121,348,444.00
- c. Debt securities held by more than 500 holders

		Approximate number of holders:
<input type="checkbox"/> secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated	\$	
<input type="checkbox"/> secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated	\$	
<input type="checkbox"/> secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated	\$	
<input type="checkbox"/> secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated	\$	
<input type="checkbox"/> secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated	\$	

- d. Number of shares of preferred stock _____
- e. Number of shares of common stock _____

Comments, if any:

3. Brief description of the Debtor's business: N/A

4. List the names of any persons who directly or indirectly owns, controls, or holds, with power to vote, 5% or more of the voting securities of the Debtor:

N/A

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Central District of California
(State)

Case number (if known): Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Verity Health System of California, Inc.

2. All other names debtor used in the last 8 years
Include any assumed names, trade names, and *doing business* as names

3. Debtor's federal Employer Identification Number (EIN) 9 1 - 2 1 4 5 4 8 4

4. Debtor's address

Principal place of business		Mailing address, if different from principal place of business	
<u>2040 E. Mariposa Avenue</u>		<u></u>	
Number	Street	Number	Street
<u>El Segundo</u>		<u>P.O. Box</u>	
City	State	City	State
<u>CA</u>	<u>90245</u>		ZIP Code
	ZIP Code		
<u>Los Angeles County</u>		Location of principal assets, if different from principal place of business	
County		<u></u>	
		Number	Street
		<u></u>	
		City	State
			ZIP Code

5. Debtor's website (URL) https://verity.org

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other, Specify:

Debtor Verity Health System of California, Inc.
Name

Case number (if known)

7. Describe debtor's business

A. Check one:

- ☒ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☐ None of the above

B. Check all that apply:

- ☒ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.naics.com/search/>.

6 2 2 1

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

If more than 2 cases, attach a separate list.

☒ No

☐ Yes. District _____ When _____ Case number _____
MM / DD / YYYY
District _____ When _____ Case number _____
MM / DD / YYYY

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

List all cases. If more than 1, attach a separate list.

☐ No

☒ Yes. Debtor See attached list. Relationship _____
District _____ When _____
Case number, if known _____
MM / DD / YYYY

Debtor

Verity Health System of California, Inc.
Home

Case number (if known)

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

- ☒ No
- ☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____

Where is the property?

Number

Street

City

State

ZIP Code

Is the property insured?

- ☐ No
- ☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

- ☐ 1-49
- ☐ 50-99
- ☒ 100-199
- ☐ 200-999

- ☐ 1,000-5,000
- ☐ 5,001-10,000
- ☐ 10,001-25,000

- ☐ 25,001-50,000
- ☐ 50,001-100,000
- ☐ More than 100,000

15. Estimated assets

- ☐ \$0-\$50,000
- ☐ \$50,001-\$100,000
- ☐ \$100,001-\$500,000
- ☐ \$500,001-\$1 million

- ☐ \$1,000,001-\$10 million
- ☐ \$10,000,001-\$50 million
- ☐ \$50,000,001-\$100 million
- ☐ \$100,000,001-\$500 million

- ☒ \$500,000,001-\$1 billion
- ☐ \$1,000,000,001-\$10 billion
- ☐ \$10,000,000,001-\$50 billion
- ☐ More than \$50 billion

Debtor

Verity Health Systems of California, Inc.

Case number (if known)

16. Estimated liabilities

- ☐ \$0-\$50,000 ☐ \$1,000,001-\$10 million ☒ \$500,000,001-\$1 billion
☐ \$50,001-\$100,000 ☐ \$10,000,001-\$50 million ☐ \$1,000,000,001-\$10 billion
☐ \$100,001-\$500,000 ☐ \$50,000,001-\$100 million ☐ \$10,000,000,001-\$50 billion
☐ \$500,001-\$1 million ☐ \$100,000,001-\$500 million ☐ More than \$50 billion

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

- ☐ The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
☐ I have been authorized to file this petition on behalf of the debtor.
☐ I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 08/31/2018

MM / DD / YYYY

x

Signature of authorized representative of debtor

Richard Adcock

Printed name

Title Chief Executive Officer

18. Signature of attorney

x

Signature of attorney for debtor

Date 08/31/2018

MM / DD / YYYY

Samuel R. Malzel (Bar No. 189301)

Printed name

Dentons US LLP

Firm name

601 South Figueroa Street, Suite 2500

Number Street

Los Angeles

City

CA

State

90017-5704

ZIP Code

(213) 623-9300

Contact phone

samuel.malzel@dentons.com

Email address

189301

Bar number

CA

State

Debtor Verity Health System of California, Inc.
Name

Case number (if known)

Fill in this information to identify your case:

United States Bankruptcy Court for the:
Central District of California

Case number (if known) Chapter 11

☐ Check if this an
amended filing

FORM 201. VOLUNTARY PETITION
Pending Bankruptcy Cases Attachment

Debtor	O'Connor Hospital	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	O'Connor Hospital Foundation	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	Saint Louise Regional Hospital	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	Saint Louise Regional Hospital Foundation	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	St. Francis Medical Center	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	St. Francis Medical Center of Lynwood Foundation	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	St. Vincent Medical Center	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	St. Vincent Foundation	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	St. Vincent Dialysis Center, Inc.	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	Seton Medical Center	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	Seton Medical Center Foundation	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	Verity Business Services	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	Verity Medical Foundation	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	DePaul Ventures, LLC	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	DePaul Ventures - San Jose, ASC, LLC	Relationship to you	Affiliate
District	When	Case number, if known	

Debtor Verity Health System of California, Inc.

Case number (if known)

Name

Fill in this information to identify your case:

United States Bankruptcy Court for the:
Central District of California

Case number (if known) Chapter 11

☐ Check if this an
amended filing

FORM 201. VOLUNTARY PETITION

Pending Bankruptcy Cases Attachment - Continued

Debtor	Verity Holdings, LLC	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor	VHoldings Mob, LLC	Relationship to you	Affiliate
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	
Debtor		Relationship to you	
District	When	Case number, if known	

CPROOF OF SERVICE

Christopher Steele v. St. Louise Regional Hospital
Santa Clara County Case No. 18CV331350

I am employed with the law firm of Dentons US LLP, whose address is 601 South Figueroa Street, Suite 2500, Los Angeles, California 90017-5704. I am over the age of eighteen years, and am not a party to this action.

On September 10, 2018, I served the following:

NOTICE OF STAY OF PROCEEDINGS

on the interested parties in this action by:

☒ **U. S. MAIL:** I placed a copy in a separate envelope, with postage fully prepaid, for each address named on the attached service list for collection and mailing on the below indicated day following the ordinary business practices at Dentons US LLP. I certify I am familiar with the ordinary business practices of my place of employment with regard to collection for mailing with the United States Postal Service. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit or mailing affidavit.

☐ **OVERNIGHT MAIL:** I sent a copy via Federal Express for overnight delivery.

☐ **HAND DELIVERY:**

☐ **FACSIMILE:** I sent a copy via facsimile transmission to the telefax number(s) indicated below. The facsimile machine I used complied with California Rules of Court, Rule 2003 and no error was reported by machine. Pursuant to California Rules of Court, Rule 2006(d), I caused the machine to print a transmission record of the transmission, a copy of which is attached to this declaration.

☐ **BY ELECTRONIC SUBMISSION:** per court order, submitted electronically to Verilaw to be posted to the website and notice given to all parties that the document has been served.

Nathaniel Leeds
Brent & Fiol LLP
1000 4th Street, Suite 750
San Rafael, CA 94901

☒ **(STATE):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

I declare that the foregoing is true under penalty of perjury under the laws of the State of California.

Executed at Los Angeles, California on September 10, 2018.


KATHRYN HOWARD

108998409\V-1

PROOF OF SERVICE

Exhibit E

Fill in this information to identify the case:

Debtor Name: In re : Verity Health System of California, Inc.
United States Bankruptcy Court for the: Central District of California
Case number (if known): 18-20151 (EMR)

☐ Check if this is an amended filing

Official Form 206Sum

Summary of Assets and Liabilities for Non-Individuals

12/15

Part 1: Summary of Assets

1. Schedule A/B: Assets—Real and Personal Property (Official Form 206A/B)

1a. Real property:

Copy line 88 from *Schedule A/B*

\$ 0.00

1b. Total personal property:

Copy line 91A from *Schedule A/B*

\$ 597,741,862.11

1c. Total of all property:

Copy line 92 from *Schedule A/B*

\$ 597,741,862.11

Part 2: Summary of Liabilities

2. Schedule D: Creditors Who Have Claims Secured by Property (Official Form 206D)

Copy the total dollar amount listed in Column A, *Amount of claim*, from line 3 of *Schedule D*

\$ 461,593,868.65

3. Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 206E/F)

3a. Total claim amounts of priority unsecured claims:

Copy the total claims from Part 1 from line 5a of *Schedule E/F*

\$ 959,007.83

3b. Total amount of claims of nonpriority amount of unsecured claims:

Copy the total of the amount of claims from Part 2 from line 5b of *Schedule E/F*

+ \$ 218,104,803.95

4 Total liabilities

Lines 2 + 3a + 3b

\$ 680,657,680.43

Part 2: List All Creditors with NONPRIORITY Unsecured Claims

3 List in alphabetical order all of the creditors with nonpriority unsecured claims. If the debtor has more than 6 creditors with nonpriority unsecured claims, fill out and attach the Additional Page of Part 2.

Amount of claim

3.1 Nonpriority creditor's name and mailing address

As of the petition filing date, the claim is: \$ 218,104,803.95

See Schedule E/F, Part 2 Attachment

Check all that apply.

Creditor Name

☐ Contingent

Creditor's Notice name

☐ Unliquidated

Address

☐ Disputed

Basis for the claim:

City

State

ZIP Code

Country

Date or dates debt was incurred

Is the claim subject to offset?

Last 4 digits of account

☐ No

number

☐ Yes

In re: Verity Health System of California, Inc.

Case No. 18-20151

Schedule E/F, Part 2

Creditors Who Have NONPRIORITY Unsecured Claims

Line	Nonpriority Creditor's Name	Creditor Notice Name	Address 1	Address 2	City	State	Zip	Country	Date incurred	Basis for claim	Subject to offset (Y/N)	Contingent	Unliquidated	Disputed	Amount of claim
3.29	CANADIAN TRAVEL NURSES		1344 MOUNT PLEASANT ROAD		TORONTO	ON	M4N 2T3	CANADA		Trade	N				\$27,279.46
3.30	CAPTURE TECHNOLOGIES, INC		2617 K STREET		SACRAMENTO	CA	95816			Trade	N				\$910.21
3.31	CASTLE SERVICES		3963 ENTERPRISE AVENUE		NAPLES	FL	34104			Trade	N				\$1,200.00
3.32	CDW COMPUTER CENTERS INC		200 N. MILWAUKEE AVENUE		VERNON HILLS	IL	60061			Trade	N				\$42,236.11
3.33	CDW GOVERNMENT INC		200 NORTH MILWAUKEE AVE.		VERNON HILLS	IL	60061			Trade	N				\$781,141.39
3.34	CERESOFIT		1738 ELTON ROAD	SUITE 121	SILVER SPRING	MD	20903			Trade	N				\$3,440.38
3.35	CERNER HEALTH SERVICES INC FORMERLY SIEM	C/O US BANK	P O. BOX 959167		ST LOUIS	MO	63195-9167			Trade	N				\$39,471.29
3.36	CHA PUBLICATION SALES		1215 K STREET SUITE 800		SACRAMENTO	CA	95814			Trade	N				\$365.00
3.37	CHANGE HEALTHCARE FORMELY EMDEON		P O. BOX 572490		MURRAY	UT	84157-2490			Trade	N				\$11,440.93
3.38	CHARTER COMMUNICATIONS		400 ATLANTIC STREET 10TH FLOOR		STAMFORD	CT	06901			Trade	N				\$1,612.75
3.39	CHRISTOPHER STEELE	C/O NATHANIEL LEEDS	BRENT & FIOL LLP	1000 FOURTH STREET SUITE 750	SAN RAFAEL	CA	94901		4/13/2017	Professional Liability	N	X	X	X	Unknown
3.40	CIGNA HEALTHCARE		P O BOX 182223		CHATTANOOGA	TN	37422-7223			Trade	N				\$10,231.83
3.41	CIRIUS GROUP, INC		2300 CONTRA COSTA BLVD.	SUITE 250	PLEASANT HILL	CA	94523			Trade	N				\$11,270.00
3.42	CKR INTERACTIVE DBA C K R GROUP INC		399 NORTH THIRD STREET		CAMPBELL	CA	95008			Trade	N				\$24,900.00
3.43	CLINICOMP INTL INC		9655 TOWNE CENTRE DR		SAN DIEGO	CA	92121			Trade	N				\$51,932.00
3.44	CO ARCHITECTS		5055 WILSHIRE BLVD	9TH FLOOR	LOS ANGELES	CA	90036			Trade	N				\$185,940.75
3.45	CONCUR TECHNOLOGIES, INC.		62157 COLLECTIONS CENTER DR		CHICAGO	IL	60693			Trade	N				\$4,729.96
3.46	CONDADO GROUP INC		1321 BURLINGAME STREET	SUITE M	KANSAS CITY	MO	64116			Trade	N				\$3,900.00
3.47	CONNECTION DBA MORE DIRECT INC		4800 T-REX AVENUE	SUITE 300	BOCA RATON	FL	33431			Trade	N				\$45,309.03
3.48	CUSHMAN AND WAKEFIELD CA INC		1350 BAYSHORE HIGHWAY	SUITE 900	BURLINGAME	CA	94010			Trade	N				\$9,914.74
3.49	DAVID BAGSHAW		2040 EAST MARIPOSA AVENUE		EL SEGUNDO	CA	90245			Employee Claim (amount over \$12,850 cap)	N				\$886.34
3.50	DE PAUL VENTURES, LLC		203 REDWOOD SHORES PARKWAY, SUITE 800		REDWOOD CITY	CA	94065			Intercompany Payable	Y				\$2,888,000.00
3.51	DELOITTE TOUCHE LLP		P O. BOX 844708		DALLAS	TX	75284-4708			Trade	N				\$137,477.50
3.52	DELTA DENTAL CA		PO BOX 44460		SAN FRANCISCO	CA	94144			Trade	N				\$441,997.04

Fill in this information to identify the case:

Debtor Name: In re : St. Louise Regional Hospital
United States Bankruptcy Court for the: Central District of California
Case number (if known): 18-20162 (EMR)

☐ Check if this is an amended filing

Official Form 206Sum

Summary of Assets and Liabilities for Non-Individuals

12/15

Part 1: Summary of Assets

1. Schedule A/B: Assets—Real and Personal Property (Official Form 206A/B)

1a. Real property:

Copy line 88 from *Schedule A/B*

\$ 10,408,593.13

1b. Total personal property:

Copy line 91A from *Schedule A/B*

\$ 33,798,164.67

1c. Total of all property:

Copy line 92 from *Schedule A/B*

\$ 44,206,757.80

Part 2: Summary of Liabilities

2. Schedule D: Creditors Who Have Claims Secured by Property (Official Form 206D)

Copy the total dollar amount listed in Column A, *Amount of claim*, from line 3 of *Schedule D*

\$ 461,445,000.00

3. Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 206E/F)

3a. Total claim amounts of priority unsecured claims:

Copy the total claims from Part 1 from line 5a of *Schedule E/F*

\$ 1,013.61

3b. Total amount of claims of nonpriority amount of unsecured claims:

Copy the total of the amount of claims from Part 2 from line 5b of *Schedule E/F*

+ \$ 79,327,077.29

4. Total liabilities

Lines 2 + 3a + 3b

\$ 540,773,090.90

Part 2: List All Creditors with NONPRIORITY Unsecured Claims

3. List in alphabetical order all of the creditors with nonpriority unsecured claims. If the debtor has more than 6 creditors with nonpriority unsecured claims, fill out and attach the Additional Page of Part 2.

		Amount of claim
3.1 Nonpriority creditor's name and mailing address	As of the petition filing date, the claim is:	\$ <u>Unknown</u>
Full Time Employee Commitment - See Global Notes	<i>Check all that apply.</i>	
Creditor Name	<input checked="" type="checkbox"/> Contingent	
	<input checked="" type="checkbox"/> Unliquidated	
Creditor's Notice name	<input type="checkbox"/> Disputed	
Address	Basis for the claim:	
City	State	ZIP Code
Country		
Date or dates debt was incurred	Is the claim subject to offset?	
	<input type="checkbox"/> No	
Last 4 digits of account number	<input type="checkbox"/> Yes	
3.2 Nonpriority creditor's name and mailing address	As of the petition filing date, the claim is:	\$ <u>79,327,077.29</u>
See Schedule E/F, Part 2 Attachment	<i>Check all that apply.</i>	
Creditor Name	<input type="checkbox"/> Contingent	
	<input type="checkbox"/> Unliquidated	
Creditor's Notice name	<input type="checkbox"/> Disputed	
Address	Basis for the claim:	
City	State	ZIP Code
Country		
Date or dates debt was incurred	Is the claim subject to offset?	
	<input type="checkbox"/> No	
Last 4 digits of account number	<input type="checkbox"/> Yes	

In re: St. Louise Regional Hospital

Case No. 18-20162

Schedule E/F, Part 2

Creditors Who Have NONPRIORITY Unsecured Claims

Line	Nonpriority Creditor's Name	Creditor Notice Name	Address 1	Address 2	City	State	Zip	Date incurred	Basis for claim	Subject to offset (Y/N)	Contingent	Unliquidated	Disputed	Amount of claim
3.105	CENTRAL COAST COUNTIES COUNCIL - CCCC		5605 MESA ROAD		GILROY	CA	95020		Trade	N				\$40.00
3.106	CENTRAL VALLEY IMAGING ASSOC. INC (CAL	ASSOCIATIONS, INC.	250 CHERRY LANE, STE 116		MANTECA	CA	95337		Trade	N				\$7,500.00
3.107	CENTRAL VALLEY IMAGING MED ASSOC INC(PTCENTRAL VALL	ASSOCIATION, INC.	P O BOX 398076		SAN FRANCISCO	CA	94139		Trade	N				\$146.00
3.108	CEPHEID		P.O. BOX 204399		DALLAS	TX	75320-4399		Trade	N				\$2,918.70
3.109	CEPHEID INC.		P.O. BOX 204399		DALLAS	TX	75320-4399		Trade	N				\$26,738.75
3.110	CGRS INC		1301 ACADEMY COURT		FORT COLLINS	CO	80524		Trade	N				\$16,333.00
3.111	CHANNING BETE COMPANY		200 STATE ROAD		SOUTH DEERFIELD	MA	01373-0200		Trade	N				\$3,210.00
3.112	CHARTER COMMUNICATIONS		400 ATLANTIC STREET, 10TH FLOOR		STAMFORD	CT	06901		Trade	N				\$540.15
3.113	CHERYL MCELROY		9400 NO NAME UNO		GILROY	CA	95020	9/29/2000	Workers Compensation	N	X	X	X	Unknown
3.114	CHILD SUPPORT SERVICES		P.O. BOX 45011		SALT LAKE CITY	UT	84145-0011		Trade	N				\$1,190.17
3.115	CHIRALA, ANU MD		18511 MISSION VIEW DRIVE		MORGAN HILL	CA	95037		Trade	N				\$3,000.00
3.116	CHRISTOPHER STEELE	C/O NATHANIEL LEEDS	BRENT & FIOL LLP	1000 FOURTH STREET SUITE 750	SAN RAFAEL	CA	94901	4/13/2017	Professional Liability Employee Claim (amount over \$12,850 cap)	N	X	X	X	Unknown
3.117	CHRISTY JENSEN		9400 NO NAME UNO		GILROY	CA	95020		Insurance	N				\$1,400.56
3.118	CIGNA HMO		1123 ERIN WAY		CAMPBELL	CA			Insurance	N		X		\$33,939.38
3.119	CIGNA PPO		PO BOX 182223		CHATTANOOGA	TN	37422-7223		Insurance	N		X		\$4,264.38
3.120	CINCINNATI SUB-ZERO PRODUCTS		12011 MOSTELLER RD		CINCINNATI	OH	45241-1528		Trade	N				\$41.77
3.121	CINTAS 053	CINTAS LOC #53	P.O. BOX 29059		PHOENIX	AZ	85038-9059		Trade	N				\$35.00
3.122	CINTAS CORPORATION # 630		P.O. BOX 29059		PHOENIX	AZ	85038-9059		Trade	N				\$175.00
3.123	CINTAS CORPORATION DIRECT SALES/RENTALS		6800 CINTAS BLVD	PO BOX 625737	CINCINNATI	OH	45262-5737		Trade	N				\$99.91
3.124	CITY OF GILROY		7351 ROSANNA ST.		GILROY	CA	95020-6141		Utilities	N				\$27,388.11
3.125	CIVCO MEDICAL SOLUTIONS/933598		PO BOX 933598		ATLANTA	GA	31193-3598		Trade	N				\$274.68
3.126	CLEAN VENT INC		1656 MCBAIN AVE		SAN JOSE	CA	95125		Trade	N				\$865.00
3.127	CM ANALYTICAL INC		6700 BREM LANE # 10		GILROY	CA	95020		Trade	N				\$4,792.50
3.128	COAST COUNTIES GLASS, INC.		3 HAZEL STREET		HOLLISTER	CA	95023		Trade	N				\$3,898.00
3.129	COLLEEN KEAHEY		9400 NO NAME UNO		GILROY	CA	95020		Employee Claim (amount over \$12,850 cap)	N				\$6,338.09
3.130	COLOWRAP LLC		811 NINTH STREET	SUITE 120 #209	DURHAM	NC	27705		Trade	N				\$1,829.39