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*Counsel for the Official Committee of  
Unsecured Creditors of Verity Health System of  
California, Inc., et al.*

**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  
☐ Verity Health System of California, Inc.  
☐ O'Connor Hospital  
☐ Saint Louise Regional Hospital  
☐ St. Francis Medical Center  
☐ St. Vincent Medical Center  
☐ Seton Medical Center  
☐ O'Connor Hospital Foundation  
☐ Saint Louise Regional Hospital  
Foundation  
☐ St. Francis Medical Center of  
Lynwood Foundation  
☐ St. Vincent Foundation  
☐ St. Vincent Dialysis Center, Inc.  
☐ Seton Medical Center Foundation  
☐ Verity Business Services  
☐ Verity Medical Foundation  
☐ Verity Holdings, LLC  
☐ De Paul Ventures, LLC  
☐ De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors In Possession.

Lead Case No. 18-20151  
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

**STIPULATION BETWEEN VERITY  
MOB FINANCING, LLC AND THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS  
EXTENDING CHALLENGE  
DEADLINE**



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1 This stipulation is entered between Verity MOB Financing, LLC ("Verity MOB"), on the one  
2 hand, and the Official Committee of Unsecured Creditors in the above-captioned jointly  
3 administered cases (the "Committee"), on the other, with respect to the following:

4 1. On September 14, 2018, the Committee was formed.

5 2. On October 4, 2018, the Court entered its *Final Order (I) Authorizing Postpetition*  
6 *Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Providing*  
7 *Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying*  
8 *Automatic Stay, and (VI) Granting Related Relief* (the "Final DIP Order") [Docket No. 409].

9 3. Pursuant to paragraph 5(e) of the Final DIP Order, the Committee has 90 days from  
10 the date of its formation to challenge Prepetition Liens (as defined in the Final DIP Order) asserted  
11 by Verity MOB (the "Original Challenge Deadline").

12 4. By mutual agreement of Verity MOB and the Committee pursuant to (i) that certain  
13 Stipulation between Verity MOB Financing, LLC and the Official Committee of Unsecured  
14 Creditors Extending Challenge Deadline entered into on December 13, 2018 [Docket No. 1045] (the  
15 "Stipulation"), (ii) that certain Stipulation between Verity MOB Financing, LLC and the Official  
16 Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 11, 2019,  
17 [Docket No. 1248], (iii) that certain Stipulation between Verity MOB Financing, LLC and the  
18 Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on January  
19 18, 2019, [Docket No. 1309], (iv) that certain Stipulation between Verity MOB Financing, LLC and  
20 the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on  
21 January 25, 2019, [Docket No. 1389], (v) that certain Stipulation between Verity MOB Financing,  
22 LLC and the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into  
23 on or around February 25, 2019, [Docket No. 1626], (vi) that certain Stipulation between Verity  
24 MOB Financing, LLC and the Official Committee of Unsecured Creditors Extending Challenge  
25 Deadline entered into on or around March 29, 2019, [Docket No. 1944], (vii) that certain Stipulation  
26 between Verity MOB Financing, LLC and the Official Committee of Unsecured Creditors Extending  
27 Challenge Deadline entered into on or around May 13, 2019, [Docket No. 2363] and (viii) that  
28 certain Stipulation between Verity MOB Financing, LLC and the Official Committee of Unsecured

1 Creditors Extending Challenge Deadline entered into on or around May 31, 2019, [Docket No.  
2 2484], the Original Challenge Deadline was extended to June 13, 2019 (the "Challenge Deadline"),  
3 in each case on the terms set forth therein.

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

5 The Challenge Deadline shall be extended from June 13, 2019 to June 21, 2019 with respect  
6 to any assets of the Debtors not constituting Acknowledged Collateral (as defined in the Stipulation).  
7 For the avoidance of doubt, nothing herein shall affect, limit or impair any rights, claims or interests  
8 of Verity MOB in any existing or future assets of Debtors whether or not they remain subject to the  
9 extended Challenge Period, including without limitation, any and all rights held under or in  
10 connection with the Loan Documents (as defined in the Stipulation) and the obligations issued  
11 thereunder.

1 **Verity MOB Financing, LLC**

2  
3 By: Ben Rosenblum  
4 Benjamin Rosenblum PP WTS  
5 Jones Day  
6 Counsel to Verity MOB Financing, LLC

7 **Official Committee of Unsecured Creditors**

8 By: James C. Behrens/AA  
9 Gregory A. Bray  
10 Mark Shinderman  
11 James C. Behrens  
12 Milbank LLP  
13 Counsel to the Official Committee of Unsecured Creditors  
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