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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 II, LLC AND THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS
EXTENDING CHALLENGE
DEADLINE**



1 This stipulation is entered between Verity MOB Financing II, LLC ("Verity MOB II"), on
2 the one 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 II (the "Original Challenge Deadline").

12 4. By mutual agreement of Verity MOB II and the Committee pursuant to (i) that certain
13 Stipulation between Verity MOB Financing II, LLC and the Official Committee of Unsecured
14 Creditors Extending Challenge Deadline entered into on December 13, 2018 [Docket No. 1047] (the
15 "Stipulation"), (ii) that certain Stipulation between Verity MOB Financing II, LLC and the Official
16 Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 11, 2019,
17 [Docket No. 1249], (iii) that certain Stipulation between Verity MOB Financing II, LLC and the
18 Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on January
19 18, 2019, [Docket No. 1310], (iv) that certain Stipulation between Verity MOB Financing II, LLC
20 and the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on
21 January 25, 2019 [Docket No. 1390], (v) that certain Stipulation between Verity MOB Financing II,
22 LLC and the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into
23 on or around February 25, 2019, [Docket No. 1627], (vi) that certain Stipulation between Verity
24 MOB Financing II, LLC and the Official Committee of Unsecured Creditors Extending Challenge
25 Deadline entered into on or around February 25, 2019, [Docket No. 1945], (vii) that certain
26 Stipulation between Verity MOB Financing II, LLC and the Official Committee of Unsecured
27 Creditors Extending Challenge Deadline entered into on or around May 13, 2019, [Docket No.
28 2364], and (viii) that certain Stipulation between Verity MOB Financing II, LLC and the Official

1 Committee of Unsecured Creditors Extending Challenge Deadline entered into on or around May 31,
2 2019, [Docket No. 2485], the Original Challenge Deadline was extended to June 13, 2019 (the
3 “Challenge Deadline”), 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 II in any existing or future assets of Debtors whether or not they remain subject to
9 the 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 II, LLC**

2
3 By: Ben Rosenblum
4 Benjamin Rosenblum *PP WJS*
5 Jones Day
6 Counsel to Verity MOB Financing II, 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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