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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

	CASE NO. 18-20151 CHAPTER 11
Verity Health System of California, Inc., et al **Debtor**.	**JOINDER OF CIGNA ENTITIES TO MOTION TO COMPEL COMPLIANCE WITH ORDER APPROVING PROCEDURES RELATED TO THE ASSUMPTION OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES [RELATED TO DOCKET NOS. 1572, 2563]** Hon. Ernest M. Robles Hearing: 07/10/19 Time: 10:00 a.m.

Cigna Healthcare of California, Inc. ("Cigna CA"), Cigna Health and Life Insurance Company ("CHLIC"), and Life Insurance Company of North America ("LINA", and collectively with Cigna CA and CHLIC, "Cigna") hereby join the *Motion to Compel Compliance With Order Approving Procedures Related to the*

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Assumption of Certain Executory Contracts and Unexpired Lease [D.I. 2563] ("Motion to Compel"), and in support thereof, respectfully state as follows:

BACKGROUND

1. Cigna CA, CHLIC and the above-captioned debtors (collectively "Debtors") are parties to three agreements (collectively, the "Cigna Provider Agreements"), pursuant to which the Debtors, through the Seton, St. Vincent and Saint Francis medical centers that they operate (collectively, "Hospitals"), provide covered healthcare services to eligible participants within the Cigna Provider Network. The Cigna Provider Agreements may be terminated without cause only upon 180 days' advance written notice.

2. Pursuant to 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* [D.I. 1279] ("Sale Motion"),

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Debtors sought this Court's approval for the sale of substantially all of their assets related to the Hospitals ("Sale").

3. On January 25, 2019, Cigna filed its *Objection of Cigna Entities to Debtors' 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* [D.I. 1349] ("Cigna Objection"). The Cigna Objection sought, *inter alia*, adequate, definitive notice of the proposed disposition of the Cigna Provider Agreements in the context of the Sale.

4. On February 19, 2019, the Court entered the *Order (1) Approving Form of Asset Purchase Agreement for Stalking Horse Bidder and for Prospective Overbidder, (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*

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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 [D.I. 1572] ("Bid Procedures Order"). The Bid Procedures Order expressly sustained the Cigna Objection, and included the following language:

> The Debtors shall, no later than the earlier of (i) 48 hours after the conclusion of the Auction, or (ii) thirty (30) days prior to the Closing Date, provide Cigna with written notice of its irrevocable decision as to whether or not the Debtors propose to assume and assign any or all of the Cigna Provider Agreements as part of the Sale; provided, however, that such notice shall be irrevocable only to the extent that the Successful Bidder's transaction is approved by this Court and an order thereon becomes final and non-appealable. The Debtors shall provide the same notice to UnitedHealthcare Insurance Company.

Bid Procedures Order, ¶ 7. [1] The Auction was scheduled to be held on April 9, 2019, making the irrevocable notice due on April 11, 2019.

5. Contrary to the directive of the Bid Procedures Order, no irrevocable notice was provided to Cigna on or after April 11, 2019.

6. Cigna, through counsel, made several follow-up requests for the irrevocable notice, including a full meet-and-confer with counsel for the Debtors,

[1] The "48 hours' language was used in lieu of a fixed date to allow for the possibility that the Auction, if held, may not have concluded on April 9, 2019. The "thirty (30) days" language was included so as to accelerate the required notice if the Sale Closing was to occur shortly after the Sale Hearing.

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the Buyer and UnitedHealthcare on May 21, 2019. However, no irrevocable notice appears forthcoming.[2]

7. On June 19, 2019, UnitedHealthcare filed the Motion to Compel.

JOINDER

8. Because the Debtors are selling all of the operations of the Hospitals, failure to assume and assign the Cigna Provider Agreements as part of the Sale will sever the Cigna Provider Agreements from the Hospitals, and thus immediately (as of the Effective Date of the Sale) sever the Hospitals and their private practice physicians from Cigna's Provider Network. This *de facto* termination of the Cigna Provider Agreements will have a significant and immediate effect on, among others: (i) those patients who are in the Hospitals awaiting or recovering from treatment because the Debtor is currently a Cigna in-network provider under the patients' healthcare coverage; (ii) people with Cigna healthcare coverage who may be contemplating treatment at the Hospitals and have already received or are awaiting pre-authorization; and (iii) patients of private practice physicians in Cigna's health services network who have privileges only at the Hospitals.

[2] The Bid Procedures Order also directed that the Debtors provide "sufficient information concerning the Qualified Bidder's ability to provide adequate assurance of performance with respect to executory contracts" to Cigna, through its counsel, no later than April 4, 2018. No information was provided to Cigna on April 4, 2019. A week after that deadline, Debtors provided Cigna with a copy of "Schedule 8.6 – AG Conditions." While that Schedule provides some relevant information, it is not fully responsive to Cigna's adequate assurance request letter to counsel for Debtors dated March 15, 2019, and does not otherwise provide sufficient information concerning the Buyer's ability to provide adequate assurance of performance with respect to the LINA Contracts or the Cigna Provider Agreements.

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Additionally, severance from the Cigna Provider Network may disrupt doctors, employer groups and covered persons in the Hospitals' respective communities.

9. As required by the Bid Procedures Order, adequate, advance notice of the proposed severance of any Hospital from the Cigna Provider Network must be provided in order to, *inter alia,* ensure that patients, covered individuals in the community and healthcare providers are smoothly transitioned from the Hospitals and are not economically prejudiced through no fault of their own.

10. Debtors have failed to comply with the letter and spirit of the Bid Procedures Order. For the reasons set forth herein, in the Cigna Objection, and in the Motion to Compel, cause exists to compel the Debtors to immediately provide Cigna with written notice of their irrevocable decision as to whether or not they propose to assume or assign the Cigna Provider Agreements as part of the Sale.

11. To be clear, Cigna does not seek to compel the assumption and assignment of the Cigna Provider Agreements as part of the Sale. Rather, Cigna seeks only what the Bid Procedures Order directs: irrevocable notice as to whether the Cigna Provider Agreements will or will not be assumed and assigned as part of the Sale.

WHEREFORE, Cigna respectfully requests that this Court enter an order that: (i) directs the Debtors to immediately provide Cigna with written notice of their irrevocable decision as to whether or not they propose to assume or assign the

Cigna Provider Agreements as part of the Sale; and (ii) grants Cigna such additional relief to Cigna as this Court deems just and equitable.

Dated: June 20, 2019

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By: /s/ William M. Rathbone
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled (*specify*): JOINDER OF CIGNA ENTITIES TO MOTION TO COMPEL COMPLIANCE WITH ORDER APPROVING PROCEDURES RELATED TO THE ASSUMPTION OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES
will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 06/20/19, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
See attached service list

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On (*date*)_____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 03/12/2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

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

06/20/19	Sylvia Durazo	/s/ Sylvia Durazo
Date	*Printed Name*	*Signature*

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