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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. Judge Ernest M. Robles

**NOTICE OF NON-MATERIAL
MODIFICATION TO NOTICE OF
EXTENDED BAR DATE RE CERTAIN
WAGE AND HOUR CLAIMANTS**

[RELATED DOCKET NOS. 2537, 2591]

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



18201511907050000000000008

1 **PLEASE TAKE NOTICE** that, on June 11, 2019, the Court entered an *Order*
2 *(1) Extending Claims Bar Date Only as to Members of the Putative Wage and Hour Class and*
3 *(2) Establishing Procedures for Providing Notice of the Extended Claims Bar Date* [Docket No.
4 2537] (the “Order”). The Order required the above-captioned debtors and debtors-in-possession
5 (the “Debtors”) to file a proposed form of bar date notice for certain wage and hour claims not later
6 than June 21, 2019. *See Order at 2.* On June 21, 2019, the Debtors filed their *Proposed Form of*
7 *Notice of Extended Bar Date re Certain Wage and Hour Claimants* [Docket No. 2591] (the
8 “Notice”). Court approval of the Notice is currently pending.

9 **PLEASE TAKE FURTHER NOTICE** that the Notice listed an address for the Debtors’
10 Claims and Noticing Agent, Kurtzman Carson Consultants LLC (“KCC”). KCC’s address,
11 however, has recently changed from the address in the Notice, and its new mailing address for
12 proofs of claim in the above-captioned cases to is 222 N. Pacific Coast Highway, Suite 300, El
13 Segundo, CA 90245. Accordingly, the Debtors submit a modified version of the Notice (the
14 “Modified Notice”), attached hereto as **Exhibit A**, reflecting KCC’s change of address. The
15 Debtors also submit, as **Exhibit B** hereto, a redline comparison of the Modified Notice against the
16 version of the Notice filed by the Debtors on June 21, 2019. The change of address is a non-
17 material modification to the Notice, but the Debtors desire to notify interested parties of the change
18 to the original Notice. The Debtors respectfully request that the Court approve the Modified Notice.

19
20 Dated: July 5, 2019

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON
SAM J. ALBERTS

21
22
23 By /s/ Tania M. Moyron
24 Tania M. Moyron

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

Exhibit A

Modified Notice

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Debtors and Debtors In Possession.

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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 EXTENDED BAR DATE RE
CERTAIN WAGE AND HOUR CLAIMANTS**

EXTENDED BAR DATE: OCTOBER 11, 2019

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

1 **TO POTENTIAL CLAIMANT:**

2 **NOTICE OF EXTENDED BAR DATE FOR CERTAIN WAGE AND HOUR CLAIMS**

3 You are receiving this notice because Verity Health System of California, Inc., a California
4 nonprofit benefit corporation, and the above-referenced affiliated debtors, the debtors and debtors
5 in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the “Debtors”) have
6 determined that you potentially have a claim for damages against the Debtors on account of certain
7 alleged wage and hour violations (a “Wage and Hour Claim”) set forth more fully in the *Motion of*
8 *(1) Waheed Wahidi for Authorization to File a Class Proof of Claim on Behalf of Claimants*
Similarly Situated, and (2) Ernesto Madrigal for Authorization to File a Class Request for Payment
of Administrative Expense on Behalf of Claimants Similarly Situated [Docket No. 1914] (the
“Motion”).¹

9 You may view a copy of the Motion for free on the website maintained by the Debtors’
10 claims and noticing agent, Kurtzman Carson Consultants LLC (“KCC”), which is available at
11 <https://www.kccllc.net/verityhealth>, or by requesting a copy from KCC. KCC is located at 222 N.
Pacific Coast Highway, Suite 300, El Segundo, CA 90245, and available by phone at (888) 249-
2741.

12 The Bankruptcy Court had previously set a deadline of April 1, 2019 for creditors and
13 holders of ownership interests in the Debtors to file proofs of claim against, or proofs of interest in,
14 the Debtors’ estates (the “Bar Date”). See Docket No. 1528. The Bankruptcy Court has now
15 ordered an extension of this Bar Date for Wage and Hour Claims to **October 11, 2019**. See Docket
No. 2537 at 2.

16 If you have not already filed a Wage and Hour Claim and believe you have such a Wage
17 and Hour Claim, you must complete and return the Official Form 410 (Proof of Claim) attached
18 hereto as “**Exhibit A**” by no later than **October 11, 2019** and include all applicable supporting
19 documentation. Additional copies of proof of claim forms may be obtained from KCC, located at
222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, (888) 249-2741, or by visiting
KCC’s website at <https://www.kccllc.net/verityhealth>.

20 Please be advised that all Proofs of Claim for Wage and Hour Claims, with all supporting
21 documentation, must be submitted to KCC via mail or courier **no later than October 11, 2019** at
the following address:

22
23 ¹ In general, the Motion alleges various labor and employment violations against the Debtors
24 including (i) administration of a company policy and procedure to round-down the recorded
25 time of hourly employees; (ii) failure to comply with meal period requirements; (iii) failure to
26 comply with rest period requirements; (iv) failure to comply with itemized wage statements;
27 (v) failure to pay all wages due to former hourly employees in light of the foregoing allegations
28 of rounding and meal and rest period policies; (vi) subjecting hourly employees to unlawful,
unfair, or fraudulent business acts or practices; and (vii) other acts giving rise to penalties
pursuant to section 2699 *et seq.* of the California Labor Code. See Mot. at 5 The foregoing is
a summary of the claims asserted in the Motion and is provided for informational purposes
only. The Debtors reserve all rights with respect to Wage and Hour Claims, and nothing
contained herein shall be considered an admission of liability or waiver of defenses.

Verity Claims Processing Center
c/o KCC
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

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 or liquidation 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. You may also contact counsel for the Official Unsecured Creditors Committee with any questions regarding this matter. The appropriate contact information is provided below:

Attn: James C. Behrens
Milbank LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4436
jbehrens@milbank.com

Dated: _____, 2019

DENTONS US LLP

By: _____

Samuel R. Maizel
Tania M. Moyron
Sam J. Alberts
Attorneys for Chapter 11 Debtors and Debtors in Possession

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

Exhibit A

Proof of Claim Form

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, Inc. (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?	<div style="border-bottom: 1px solid black; margin-bottom: 5px;">Name of the current creditor (the person or entity to be paid for this claim)</div> <div style="border-bottom: 1px solid black;">Other names the creditor used with the debtor</div>	
2. Has this claim been acquired from someone else?	<input type="checkbox"/> No <input type="checkbox"/> Yes. From whom? <div style="border-bottom: 1px solid black; width: 150px;"></div>	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Name</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Number Street</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">City State ZIP Code</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Country</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Contact phone</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Contact email</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</div>	Where should payments to the creditor be sent? (if different) <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Name</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Number Street</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">City State ZIP Code</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Country</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Contact phone</div> <div style="border-bottom: 1px solid black; margin-bottom: 5px;">Contact email</div>
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) <div style="border-bottom: 1px solid black; width: 100px;"></div> <div style="text-align: right;">Filed on <div style="border-bottom: 1px solid black; width: 100px;"></div></div> <div style="text-align: right; font-size: small;">MM / DD / YYYY</div>	
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? <div style="border-bottom: 1px solid black; width: 150px;"></div>	

Part 2:

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)?

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

☐ No

☐ Yes. Check all that apply:

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
222 N Pacific Coast Highway, Suite 300
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 B

Redline Comparison

SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
SAM J. ALBERTS (admitted pro hac vice)
sam.alberts@dentons.com
DENTONS US LLP
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Los Angeles, California 90017-5704
Tel: (213) 623-9300 / Fax: (213) 623-9924

Attorneys for the Chapter 11 Debtors and
Debtors In Possession

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

In re:

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

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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 EXTENDED BAR DATE RE
CERTAIN WAGE AND HOUR CLAIMANTS**

EXTENDED BAR DATE: OCTOBER 11, 2019

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

1
2
3 **TO POTENTIAL CLAIMANT:**

4 **NOTICE OF EXTENDED BAR DATE FOR CERTAIN WAGE AND HOUR CLAIMS**

5 You are receiving this notice because Verity Health System of California, Inc., a California
6 nonprofit benefit corporation, and the above-referenced affiliated debtors, the debtors and debtors
7 in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the “Debtors”)
8 have determined that you potentially have a claim for damages against the Debtors on account of
9 certain alleged wage and hour violations (a “Wage and Hour Claim”) set forth more fully in the
10 *Motion of (1) Waheed Wahidi for Authorization to File a Class Proof of Claim on Behalf of*
Claimants Similarly Situated, and (2) Ernesto Madrigal for Authorization to File a Class Request
for Payment of Administrative Expense on Behalf of Claimants Similarly Situated [Docket No.
1914] (the “Motion”).¹

11 You may view a copy of the Motion for free on the website maintained by the Debtors’
12 claims and noticing agent, Kurtzman Carson Consultants LLC (“KCC”), which is available at
13 <https://www.kccllc.net/verityhealth>, or by requesting a copy from KCC. KCC is located at ~~2335~~
~~Alaska Avenue~~, [222 N. Pacific Coast Highway, Suite 300](#), El Segundo, CA 90245, and available by
14 phone at (888) 249-2741.

15 The Bankruptcy Court had previously set a deadline of April 1, 2019 for creditors and
16 holders of ownership interests in the Debtors to file proofs of claim against, or proofs of interest in,
17 the Debtors’ estates (the “Bar Date”). See Docket No. 1528. The Bankruptcy Court has now
ordered an extension of this Bar Date for Wage and Hour Claims to **October 11, 2019**. See Docket
No. 2537 at 2.

18 If you have not already filed a Wage and Hour Claim and believe you have such a Wage and
19 Hour Claim, you must complete and return the Official Form 410 (Proof of Claim) attached hereto
20 as “**Exhibit A**” by no later than **October 11, 2019** and include all applicable supporting
documentation. Additional copies of proof of claim forms may be obtained from KCC, located at
21 ~~2335 Alaska Avenue~~, [222 N. Pacific Coast Highway, Suite 300](#), El Segundo, CA 90245, (888)
249-2741, or by visiting KCC’s website at <https://www.kccllc.net/verityhealth>.

22
23 ¹ In general, the Motion alleges various labor and employment violations against the Debtors
including (i) administration of a company policy and procedure to round-down the recorded
24 time of hourly employees; (ii) failure to comply with meal period requirements; (iii) failure to
comply with rest period requirements; (iv) failure to comply with itemized wage statements; (v)
25 failure to pay all wages due to former hourly employees in light of the foregoing allegations of
rounding and meal and rest period policies; (vi) subjecting hourly employees to unlawful,
26 unfair, or fraudulent business acts or practices; and (vii) other acts giving rise to penalties
pursuant to section 2699 *et seq.* of the California Labor Code. See Mot. at 5 The foregoing is a
27 summary of the claims asserted in the Motion and is provided for informational purposes only.
The Debtors reserve all rights with respect to Wage and Hour Claims, and nothing contained
28 herein shall be considered an admission of liability or waiver of defenses.

Please be advised that all Proofs of Claim for Wage and Hour Claims, with all supporting documentation, must be submitted to KCC via mail or courier **no later than October 11, 2019** at the following address:

Verity Claims Processing Center
c/o KCC
~~2335 Alaska Avenue~~
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

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 or liquidation 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. You may also contact counsel for the Official Unsecured Creditors Committee with any questions regarding this matter. The appropriate contact information is provided below:

Attn: James C. Behrens
Milbank LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4436
jbehrens@milbank.com

Dated: _____, 2019

DENTONS US LLP

By: _____

Samuel R. Maizel
Tania M. Moyron
Sam J. Alberts
Attorneys for Chapter 11 Debtors and Debtors in Possession

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Document 2 ID	interwovenSite://USDMS/US_Active/112734264/2
Description	#112734264v2<US_Active> - Putative Wage and Hour Class Bar Date Notice
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