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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

**STIPULATION BETWEEN DEBTORS, ROSA
CARCAMO AND IVONNE ENGELMAN
CONTINUING HEARING ON MOTIONS
FOR RELIEF FROM THE AUTOMATIC
STAY [DOCKET NOS. 2557 & 2558]**

CURRENT HEARING:

Date: July 29, 2019

PROPOSED NEW HEARING:

Date: August 5, 2019

Time: 10:00 A.M.

Place: Courtroom 1568

255 East Temple Street

Los Angeles, California 90012-3300

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



1 This Stipulation is entered into by and between Debtors Verity Health System of
2 California, Inc. (“VHS”) and St. Francis Medical Center (“St. Francis”), debtors and debtors in
3 possession in the above-captioned chapter 11 bankruptcy cases, on the one hand, and movants
4 Rosa Carcamo, and Ivonne Engelman (collectively, the “Movants”), on the other, each Movant
5 having filed a Motion For Relief From The Automatic Stay [Docket Nos. 2557 and 2558], with
6 respect to the following facts.

7 **RECITALS**

8 1. On August 31, 2018 (the “Petition Date”), VHS and the sixteen affiliated debtors,
9 debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases, each filed a
10 voluntary petition for relief under chapter 11 of the Bankruptcy Code.

11 2. On August 31, 2018, this Court entered an Order [Docket No. 17] authorizing the
12 joint administration of the Debtors’ chapter 11 cases (the “Cases”) pursuant to Bankruptcy Rule
13 1015(b) and LBR 1015-1 and 9013-1(q).

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

19 4. On June 29, 2018, Rosa Carcamo filed a Complaint against St. Francis, and others,
20 in the Superior Court of the State of California for the County of Los Angeles, Case No.
21 TC029195. On May 3, 2018, Ivonne Engelman filed a Complaint against St. Francis, and others,
22 in the Superior Court of the State of California for the County of Los Angeles, Case No.
23 BC074524.

24 5. On June 17, 2019, Rosa Carcamo filed a Motion For Relief From The Automatic
25 Stay [Docket No. 2557]. Also on June 17, 2019, Ivonne Engelman filed a Motion For Relief From
26 The Automatic Stay [Docket No. 2558] (collectively, the “Motions”). Both Motions were filed so
27 that the cases filed in the Superior Court can proceed.

28 6. The Debtors and the Movants are attempting to reach a resolution on the Motions.

1 7. The parties have once before continued the hearing and the operative dates, so that
2 discussions on a resolution can continue.

3 8. The parties request another continuance so discussions can continue.

4 AGREEMENT

5 WHEREFORE, the parties enter into this stipulation, pursuant to which they agree that:

6 1. The hearing on the Motions -- originally noticed for July 15, 2019, then advanced
7 by stipulation to July 29, 2019 -- shall be continued to 10:00 a.m. on Monday, August 5, 2019.

8 2. The date for the Debtors and the Creditors Committee to respond to the two
9 Motions shall be continued to July 22, 2019.

10 3. The date for Movants to file their respective Replies to the Debtors' Responses to
11 the Motions is continued to July 29, 2019.

12
13 Dated: July 12, 2019

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

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JOHN A. MOE, II

17 Attorneys for the Chapter 11 Debtors and
18 Debtors In Possession

19 Dated: July 12, 2019

LAW OFFICES OF ANDY EPSTEIN

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ANDY EPSTEIN

22 Attorney for Movants
23 Rosa Carcamo and Ivonne Engelman
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Chapter 11 Cases

Hon. Ernest M. Robles

**ORDER ON STIPULATION BETWEEN
DEBTORS, ROSA CARCAMO AND IVONNE
ENGELMAN CONTINUING HEARING ON
MOTIONS FOR RELIEF FROM THE
AUTOMATIC STAY [DOCKET NOS. 2557
AND 2558]**

CURRENT HEARING:

Date: July 29, 2019

PROPOSED NEW HEARING:

Date: August 5, 2019

Time: 10:00 A.M.

Place: 255 East Temple Street, Courtroom 1568
Los Angeles, California 90012-3300

1 Having read the proposed *Stipulation Between Debtors, Rosa Carcamo And Ivonne*
2 *Engelman Continuing Hearing On Motions For Relief From The Automatic Stay* in regard to the
3 pending Motions For Relief From The Automatic Stay filed in behalf of Rosa Carcamo and
4 Ivonne Engelman [Docket Nos. 2557 & 2558] (the “Motions”), and good cause appearing
5 therefor,

6 IT IS HEREBY ORDERED that:

7 1. The hearing on the Motions -- originally noticed for July 15, 2019, then advanced
8 by stipulation to July 29, 2019 -- shall be continued to 10:00 a.m. on Monday, August 5, 2019.

9 2. The date for the Debtors and the Creditors Committee to respond to the two
10 Motions shall be continued to July 22, 2019.

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