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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
ASC, 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

Hon. Judge Ernest M. Robles

**SUBMISSION OF SIGNATURE PAGE OF
RICHARD G. ADCOCK RE DECLARATION IN
SUPPORT OF MOTION FOR AN ORDER
APPROVING, *NUNC PRO TUNC* TO JULY 1,
2019, CERTAIN ACCOMMODATIONS
REQUESTED BY OLD REPUBLIC INSURANCE
COMPANY IN CONNECTION WITH THE
RENEWAL OF THE DEBTORS' WORKERS'
COMPENSATION INSURANCE POLICY**

[RELATES TO DOCKET NO. 2564]

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1 f. Old Republic shall not draw on the Replacement Letter of Credit based upon
2 the Debtors' insolvency or bankruptcy. The terms of the existing Stipulation shall remain in effect
3 with respect to the Renewed Workers' Compensation Insurance Policy.

4 10. Old Republic has advised the Debtors that it will not renew the Workers'
5 Compensation Policy, absent approval of the Motion.

6
7 11. I believe that there is more than ample business justification to seek approval of the
8 Accommodations. Old Republic has agreed to renew the Workers' Compensation Policy, but, it
9 agreed to do so only upon the entry of an order by the Bankruptcy Court approving the
10 Accommodations. There is no alternative coverage available, except the coverage offered from the
11 Fund at a significantly higher cost. Further, Debtors would incur substantial disruption in the claims
12 management process. In the first instance, even with a new carrier Debtors would have no practical
13 ability to expeditiously reduce the amount of collateral held by Old Republic, which covers existing
14 obligations as well as those obligations under the Renewed Workers' Compensation Policy. Further,
15 converting to a new carrier and possibly its claims processing system would be burdensome and
16 costly, particularly in view of the number of outstanding claims already being addressed.

17
18 I declare under penalty of perjury and of the laws in the United States of America, the
19 foregoing is true and correct.

20 Executed this 1st day of July, 2019, at Los Angeles, California.

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RICHARD G. ADCOCK