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IRENE RODRIGUEZ

**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 DePaul Ventures, LLC
- ☐ Affects DePaul 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 VERITY  
HEALTH SYSTEM OF CALIFORNIA, INC.,  
ST. FRANCIS MEDICAL CENTER AND IRENE  
RODRIGUEZ GRANTING MS. RODRIGUEZ  
RELIEF FROM THE AUTOMATIC STAY TO  
PERMIT PARTIES TO PROCEED WITH  
MEDIATION**

**[No Hearing Required]**



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1 This Stipulation is entered into by and between the debtors Verity Health System of  
2 California, Inc. ("VHS") and St. Francis Medical Center ("St. Francis"), debtors and debtors in  
3 possession in these jointly administered cases (the "Cases"), stipulating to relief from the automatic  
4 stay, so that the parties may proceed to mediation to resolve the allegations asserted by  
5 Ms. Rodriguez against VHS and St. Francis, as set forth in a Complaint filed on March 15, 2019,  
6 in the Los Angeles County Superior Court, Case No. 19STCV08981, based on the following facts.

7 A. On August 31, 2018 ("Petition Date"), VHS and the above-referenced affiliated  
8 entities (collectively, the "Debtors"), the debtors and debtors in possession in the above-captioned  
9 chapter 11 bankruptcy cases, each filed a voluntary petition for relief under chapter 11 of the  
10 Bankruptcy Code. By entry of an order, the Cases are jointly administered before the Bankruptcy  
11 Court. [Docket No. 17]. Since the commencement of their Cases, the Debtors have been operating  
12 their businesses as debtors in possession pursuant to §§ 1107 and 1108.

13 B. On August 31, 2018, this Court entered an order authorizing the joint administration  
14 of the Cases pursuant to Bankruptcy Rule 1015(b) and LBR 1015-1 and 9013-1(q).

15 C. Debtor VHS, a California nonprofit public benefit corporation, is the sole corporate  
16 member of five Debtor California nonprofit public benefit corporations that operated O'Connor  
17 Hospital and Saint Louise Regional Hospital, and currently operates St. Francis Medical Center,  
18 Seton Medical Center, including Seton Medical Center Coastside Campus (collectively, the  
19 "Hospitals"), and other facilities in the state of California.

20 D. At the inception of the cases, VHS, the Hospitals, and their affiliated entities opera-  
21 ted as a nonprofit health care system, with approximately 1,680 inpatient beds, six active emergen-  
22 cy rooms, a trauma center, eleven medical office buildings, and a host of medical specialties,  
23 including tertiary and quaternary care. *Declaration Of Richard G. Adcock In Support of Emergency*  
24 *First-Day Motions* (the "First Day Declaration") [Docket No. 8], at 4, 12. On the Petition Date,  
25 the Debtors had approximately 850 inpatients. *Id.*, at 6, 17. The scope of the services that were  
26 provided by the Verity Health System is exemplified by the fact that in 2017, the Hospitals provided  
27 medical services to over 50,000 inpatients and approximately 480,000 outpatients. *Id.*, at 4, 12.

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1 E. A detailed description of the Debtors' businesses, capital structure, and the events  
2 leading to the commencement of these Cases is contained in the First Day Declaration.

3 F. On September 17, 2018, the U.S. Trustee appointed a statutory creditors' committee  
4 pursuant to § 1102.

5 G. No trustee or examiner has been appointed in these Cases.

6 H. On March 15, 2019, Ms. Rodriguez filed a Complaint against VHS and St. Francis  
7 in the Los Angeles County Superior Court, Case No. 19STCV08981(the "LASC CASE").

8 I. Ms. Rodriguez also filed a Complaint of Employment Discrimination with the  
9 Department of Fair Employment and Housing, State of California.

10 J. The parties wish to proceed to mediation to resolve the LASC CASE and the  
11 Complaint of Employment Discrimination.

12 WHEREFORE, VHS, St. Francis and Ms. Rodriguez stipulate that Ms. Rodriguez shall  
13 have relief from the automatic stay, so that mediation may proceed.

14  
15 Dated: July 30, 2019

DUMAS & KIM, APC  
Christian T. Kim

16  
17 By 

CHRISTIAN T. KIM  
Attorneys for Claimant  
IRENE RODRIGUEZ

18  
19  
20 Dated: July 30, 2019

DENTONS US LLP  
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John A. Moe, II  
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