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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 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

**SUPPLEMENT TO MOTION FOR ENTRY OF  
AN ORDER FIXING A BAR DATE FOR  
FILING CERTAIN POSTPETITION  
ADMINISTRATIVE EXPENSE CLAIMS**

**[RELATED DOCKET NOS. 2871, 2878]**

Hearing:

Date: August 28, 2019  
Time: 10:00 a.m. (Pacific Time)  
Location: Courtroom 1568  
255 East Temple Street  
Los Angeles, California 90012-3300



1820151190820000000000004

1       **PLEASE TAKE NOTICE** that Verity Health System of California, Inc., a California  
2 nonprofit public benefit corporation and the Debtor herein (“VHS”), and the above-referenced  
3 affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 11 bankruptcy  
4 cases (collectively, the “Debtors”), hereby supplement (the “Supplement”) the *Notice of Motion and*  
5 *Motion for Entry of An Order (I) Fixing a Bar Date for Filing Certain Postpetition Administrative*  
6 *Expense Claims and (II) Approving the Form of Notice of the Administrative Expense Claims Bar*  
7 *Date* [Docket No. 2871] (re-filed at Docket No. 2878) (the “Motion”).<sup>1</sup>

8       **PLEASE TAKE FURTHER NOTICE** that Motion provides that the following entities that  
9 hold Administrative Expense Claims<sup>2</sup> do not need to assert an Administrative Expense Claim  
10 (collectively, the “Excluded Claims”):

- 11       a) Any entity that has already properly filed a motion requesting allowance of an  
12 administrative expense claim pursuant to § 503(b)<sup>3</sup> related to the Postpetition Period;
- 13       b) A holder of an Administrative Expense Claim related to or incurred during the Postpetition  
14 Period that previously has been allowed by order of the Court; and
- 15       c) A holder of an Administrative Expense Claim that has been paid in full by the Debtor  
16 pursuant to the Bankruptcy Code or in accordance with an Order of the Court.

17       **PLEASE TAKE FURTHER NOTICE** that, after receiving recommendations provided by  
18 the Official Committee of Unsecured Creditors and one creditor, the Debtors file this Supplement to  
19 amend the definition of Excluded Claims in the Motion to include the following:

- 20       i. Administrative Expense Claims based upon liabilities that the Debtors incur in the  
21 ordinary course of their business to providers of goods and services;
- 22       ii. Professional fee claims subject to allowance under § 330;
- 23       iii. Claims relating to the assumption and cure of an executory contract under § 365(b);
- 24       iv. Administrative Expense Claims arising out of the employment by one or more of the  
25 Debtors of an individual from and after the Petition Date, but only to the extent that

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26 <sup>1</sup> The Debtors note that they are preparing a plan of reorganization which will establish a second bar date that is forty-  
27 five (45) days following the effective date of the plan to file Administrative Expense Claims (other than Excluded  
28 Claims) which arise between the initial Administrative Expense Claims Bar Date and the effective date of the plan.

<sup>2</sup> All capitalized terms not otherwise defined herein shall have the meaning afforded in the Motion.

<sup>3</sup> All references to “§” or “section” herein are to sections of the Bankruptcy Code.

such Administrative Expense Claim is solely for outstanding wages, commissions, or  
reimbursement of business expenses; or

v. U.S. Trustee fees.

Dated: August 20, 2019

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