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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 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 HEARING ON MOTION OF THE DEBTORS
FOR AN ORDER APPROVING: (I) PROPOSED
DISCLOSURE STATEMENT; (II) SOLICITATION AND
VOTING PROCEDURES; (III) NOTICE AND
OBJECTION PROCEDURES FOR CONFIRMATION OF
DEBTORS' PLAN; AND (IV) GRANTING RELATED
RELIEF; MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF**

[RELATES TO DOCKET NOS. 2994, 2995, 2998]

Hearing Date and Time:

Date: October 2, 2019

Time: 10:00 a.m. (Pacific Time)

Location: Courtroom 1568

255 E. Temple Street

Los Angeles, CA 90012



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

1 **PLEASE TAKE NOTICE** that, on September 4, 2019, the Court entered the *Order*
2 *Setting Hearing on Motion for Approval of Disclosure Statement for October 2, 2019, at 10:00*
3 *a.m.* [Docket No. 2998], attached hereto as Exhibit “1” (the “Order”), setting a hearing (the
4 “Hearing”) on **October 2, 2019, at 10:00 a.m. (Pacific Time)**, at the above-referenced location,
5 on the *Motion of the Debtors for an Order Approving: (I) Proposed Disclosure Statement; (II)*
6 *Solicitation and Voting Procedures; (III) Notice and Objection Procedures for Confirmation of*
7 *Debtors’ Plan; and (IV) Granting Related Relief* [Docket No. 2995] (the “Motion”).

8 **PLEASE TAKE FURTHER NOTICE** that Verity Health System of California, Inc.
9 (“VHS”) and the affiliated debtors, the debtors and debtors in possession in the above-captioned
10 chapter 11 bankruptcy cases (collectively, the “Debtors”), request in the Motion that the Court
11 approve the *Disclosure Statement Describing Debtors’ Chapter 11 Plan of Liquidation (Dated*
12 *September 3, 2019)* [Docket No. 2994] (the “Disclosure Statement”). More specifically, the
13 Motion requests that the Court (i) find that the Disclosure Statement contains “adequate
14 information” pursuant to 11 U.S.C. § 1125, (ii) approve solicitation and voting procedures related
15 to confirmation of the *Debtors’ Chapter 11 Plan of Liquidation (Dated September 3, 2019)*
16 [Docket No. 2993] (the “Plan”), (iii) establish notice and objection procedures for confirmation of
17 the Plan, and (iv) grant such other relief as is necessary. The Motion is based upon this Notice,
18 the Memorandum of Points and Authorities attached to the Motion, the *Declaration of Richard G.*
19 *Adcock In Support of Emergency First-Day Motions* [Docket No. 8], the record in these cases and
20 all other matters of which this Court may take judicial notice pursuant to Rule 201 of the Federal
21 Rules of Evidence, the arguments of counsel to be made at the hearing, and all other admissible
22 evidence properly brought before the Court at or before the hearing on the Motion, if any.

23 **PLEASE TAKE FURTHER NOTICE** that any party may review and obtain a copy of
24 the Motion, Plan, and Disclosure Statement, by visiting the following website
25 <https://www.kccllc.net/verityhealth>. Parties may also contact and request a copy from: Kurtzman
26 Carson Consultants LLC (“KCC”), the Debtors’ Solicitation Agent, by sending a written request
27 via standard overnight or hand delivery to: Verity Ballot Processing Center, c/o KCC, 222 N.
28 Pacific Coast Highway, Suite 300, El Segundo, CA 90245. Additionally, copies of the Motion,

1 Disclosure Statement, and Plan are on file with the Office of the Clerk of the Bankruptcy Court for
2 review during normal business hours and are also available on the KCC website at
3 <https://www.kccelle.net/verityhealth>. A copy may also be obtained by e-mail request to:
4 Verityinfo@kccllc.com.

5 **PLEASE TAKE FURTHER NOTICE** that any party opposing or responding to the
6 Motion must file and serve the response (“Response”), pursuant to the Order and Local
7 Bankruptcy Rule 9013-1(f), on or prior to **September 18, 2019**, on the moving party and the
8 Office of the United States Trustee. A Response must be a complete written statement of all
9 reasons in opposition thereto or in support, declarations and copies of all evidence on which the
10 responding party intends to rely, and any responding memorandum of points and authorities.

11 **PLEASE TAKE FURTHER NOTICE** that, pursuant to the Order, any replies to any
12 Response must be filed and served on or prior to **September 25, 2019**.

13 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 9013-
14 1(h), the failure to file and serve a timely objection to the Motion may be deemed by the Court to
15 be consent to the relief requested therein.

16 Dated: September 4, 2019

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON
NICHOLAS A. KOFFROTH

19 By /s/ Tania M. Moyron
Tania M. Moyron

21 Attorneys for Verity Health Systems of
California, Inc., *et al.*

DENTONS US LLP
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LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

Exhibit 1

Order

FILED & ENTERED

SEP 04 2019

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY gonzalez DEPUTY CLERK

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
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- ☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors in Possession.,

Lead Case No.: 2:18-bk-20151-ER
Chapter: 11

Jointly Administered With:

Case No. 2:18-bk-20162-ER;
Case No. 2:18-bk-20163-ER;
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Case No. 2:18-bk-20179-ER;
Case No. 2:18-bk-20180-ER;
Case No. 2:18-bk-20181-ER;

Chapter 11 Cases.

**ORDER SETTING HEARING ON MOTION FOR
APPROVAL OF DISCLOSURE STATEMENT FOR
OCTOBER 2, 2019, AT 10:00 A.M.**

HEARING DATE:

Date: October 2, 2019
Time: 10:00 a.m.
Location: Ctrm. 1568
Roybal Federal Building
255 East Temple Street
Los Angeles, CA 90012



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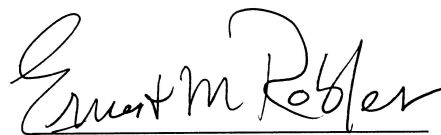
Having reviewed the *Notice of Hearing and Motion of the Debtors for an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting Procedures; (III) Notice and Objection Procedures for Confirmation of Debtors' Plan; and (IV) Granting Related Relief* [Doc. No. 2995] (the "Motion") and the application for a hearing on the Motion on 29 days' notice (as opposed to the 42 days' notice required under the Local Bankruptcy Rules), the Court **HEREBY ORDERS AS FOLLOWS:**

- 1) A hearing on the Motion is set for **October 2, 2019, at 10:00 a.m.** Any opposition to the Motion shall be submitted by no later than **September 18, 2019**. Any reply in support of the Motion shall be submitted by no later than **September 25, 2019**.
- 2) The Debtors are not required to provide telephonic notice of the hearing on the Motion.
- 3) By no later than **September 4, 2019**, the Debtors shall provide notice of the hearing on the Motion, including notice of the deadline for objecting to the Disclosure Statement, to the parties entitled to notice under Bankruptcy Rule 2002(b).
- 4) By no later than **September 18, 2019**, the Debtors shall file a declaration establishing that notice was provided in accordance with the requirements of ¶ 3.

IT IS SO ORDERED.

###

Date: September 4, 2019



Ernest M. Robles
United States Bankruptcy Judge