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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-20171-ER

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**STIPULATION REGARDING PRE-PETITION  
CLAIMS OF LONG BEACH MEMORIAL MEDICAL  
CENTER**



Verity Health System Of California, Inc. (“VHS”) and the above-referenced affiliated debtors and debtors in possession in the above captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), on the one hand and Long Beach Memorial Medical Center (“LBMMC”), on the other, hereby stipulate as follows:

### RECITALS

1. On August 31, 2018 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11. Since the commencement of their cases, the Debtors have been operating their businesses as debtors in possession pursuant to §§ 1107 and 1108 of title 11 of the United States Code, §§ 101 et seq. (the “Bankruptcy Code”).<sup>1</sup>

2. LBMMC filed Proof of Claim No. 5051, on March 29, 2019 (the “LBMMC Proof of Claim”), against St. Francis Medical Center (“SFMC”) in the total amount of \$3,807,136.29.

3. The LBMMC Proof of Claim asserts that an unspecified amount of the claim amount is entitled to administrative priority under § 503(b)(9) and 507(a)(2) for goods delivered within 20 days of the Petition (August 31, 2019) (the “§ 503(b)(9) Claim”).

### AGREEMENT

A. The LBMMC Proof of Claim shall be allowed as a general unsecured claim against SFMC in the amount of \$3,807,136.29 and shall be treated under the Debtors’ Chapter 11 plan or otherwise.

B. LBMMC is withdrawing its § 503(b)(9) Claim.

C. LBMMC reserves all rights to file any rejection damages claim in the future and the Debtors reserve all rights to object to any such claim.

D. LBMMC reserves all rights to file any motion or claim for allowance and/or payment of post-petition administrative expense in the future and the Debtors reserve all rights to object to any such motion or claim.

E. The Debtors reserve all preference and other causes of action which they or any successor to the Debtors (including, without limitation, any trust) may have against LBMMC and LBMMC reserves all rights to defend against any such cause of action on any grounds.

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<sup>1</sup> All references to § herein are to sections of the Bankruptcy Code.

1 F. The foregoing shall fully resolve the LBMMC Proof of Claim or any other claims of  
2 LBMMC relating to any of the Debtors arising prior to the Petition Date (excluding LBMMC's rejection  
3 damages claims as provided above).

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5 Dated: August 23, 2019

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