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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

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**STIPULATION CONTINUING DEADLINES  
RELATED TO ANY RESPONSE TO THE DEBTORS'  
MOTION TO APPROVE DISCLOSURE  
STATEMENT FILED BY THE PENSION BENEFIT  
GUARANTY CORPORATION**

**RELATES TO DOCKET NOS. 2995, 2998, 3003**

Hearing Date and Time:

Date: October 2, 2019

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

Place: Courtroom 1568

255 E. Temple St.

Los Angeles, CA 90012



1 This stipulation is entered into between Verity Health System Of California, Inc. and the  
2 above-referenced affiliated debtors and debtors in possession in the above captioned chapter 11  
3 bankruptcy cases (collectively, the “Debtors”), on the one hand, and the Pension Benefit  
4 Guaranty Corporation (“PBGC” and, together with the Debtors, the “Parties”), on the other, with  
5 respect to the following:

6 A. On September 3, 2019, the Debtors filed the *Debtors’ Chapter 11 Plan of*  
7 *Liquidation (Dated September 3, 2019)* [Docket No. 2993] (the “Plan”) and related *Disclosure*  
8 *Statement Describing Debtors’ Chapter 11 Plan of Liquidation (Dated September 3, 2019)*  
9 [Docket No. 2994] (the “Disclosure Statement”).

10 B. On September 4, 2019, the Debtors filed the *Notice of Hearing and Motion of the*  
11 *Debtors for an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting*  
12 *Procedures; (III) Notice and Objection Procedures for Confirmation of Debtors’ Plan; and*  
13 *(IV) Granting Related Relief* [Docket No. 2995] (the “Motion”). The Motion requests that the  
14 Court (i) approve the Disclosure Statement, (ii) find that the Disclosure Statement contains  
15 “adequate information” pursuant to 11 U.S.C. § 1125, (iii) approve solicitation and voting  
16 procedures related to confirmation of the Plan, (iv) establish notice and objection procedures for  
17 confirmation of the Plan, and (v) grant such other relief as is necessary.

18 C. On September 4, 2019, the Court entered the *Order Setting Hearing on Motion for*  
19 *Approval of Disclosure Statement for October 2, 2019, at 10:00 a.m.* [Docket No. 2998] (the  
20 “Scheduling Order”), setting the Motion for hearing on October 2, 2019 at 10:00 a.m.. The Court  
21 also set September 18, 2019 as the deadline to file oppositions to the Motion (the “Opposition  
22 Deadline”) and September 25, 2019 as the deadline to file replies (the “Reply Deadline”) in  
23 support of the Motion. *See* Scheduling Order, ¶ 1 at 2.

24 D. The Parties are engaged in negotiations concerning the Disclosure Statement and  
25 Plan, and jointly agree to extend the Opposition Deadline and Reply Deadline to allow additional  
26 time to engage in negotiations.

27 NOW, THEREFORE, all of the Parties to this Stipulation hereby stipulate and agree as  
28 follows:



1. The Opposition Deadline for the PBGC shall be extended from September 18, 2019 to September 23, 2019.

2. The Reply Deadline for the Debtors shall be extended from September 25, 2019 to September 30, 2019 at 12:00 p.m. (Pacific Time) with respect to any opposition or response to the Motion filed by the PBGC.

Dated: September 16, 2019

DENTONS US LLP


By: \_\_\_\_\_

Tania M. Moyron

Counsel to the Debtors and Debtors in Possession

Dated: September 16, 2019

PENSION BENEFIT GUARANTY CORPORATION  
OFFICE OF THE GENERAL COUNSEL

By:  \_\_\_\_\_

Melissa T. Harris

Counsel to the Pension Benefit Guaranty Corporation