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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 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 OLD REPUBLIC
INSURANCE COMPANY AND THE CHUBB
COMPANIES**

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



This stipulation is entered into between Verity Health System Of California, Inc. 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 Old Republic Insurance Company (“Old Republic”) and Federal Insurance Company, ACE American Insurance Company, and Illinois Union Insurance Company (collectively, the “Chubb Companies” and, together with the Debtors and Old Republic, the “Parties”), on the other, with respect to the following:

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

B. On September 4, 2019, the Debtors filed 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* [Docket No. 2995] (the “Motion”). The Motion requests that the Court (i) approve the Disclosure Statement, (ii) find that the Disclosure Statement contains “adequate information” pursuant to 11 U.S.C. § 1125, (iii) approve solicitation and voting procedures related to confirmation of the Plan, (iv) establish notice and objection procedures for confirmation of the Plan, and (v) grant such other relief as is necessary.

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

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

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

3 1. The Opposition Deadline for Old Republic and the Chubb Companies shall be
4 extended from September 18, 2019 to September 20, 2019.

5 2. The Reply Deadline for the Debtors shall be extended from September 25, 2019 to
6 September 27, 2019 with respect to any opposition or response to the Motion filed by Old
7 Republic or the Chubb Companies.

8
9 Dated: September 16, 2019

DENTONS US LLP

10 By: /s/ Tania M. Moyron

11 Tania M. Moyron

12 Counsel to the Debtors and Debtors in Possession

13 Dated: September 16, 2019

FOX SWIBEL LEVIN & CARROLL LLP

14
15 By: _____

Margaret M. Anderson

16 Counsel to Old Republic Insurance Company

17
18 Dated: September 16, 2019

DUANE MORRIS LLP

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20 By: _____

Marcus O. Colabianchi

21 Counsel to the Chubb Companies
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18 Wendy M. Simkulak

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