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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

**MOTION TO CONTINUE 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  
[RELATES TO DOCKET NOS. 2994, 2995]**

Proposed Continued Hearing Date and Time:

Date: October 15, 2019  
Time: 10:00 a.m. (Pacific Time)  
Place: Courtroom 1568  
255 E. Temple St.  
Los Angeles, CA 90012

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Verity Health System of California, Inc. (“VHS”) and the affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), respectfully request (the “Motion”) that the Court approve a continuance of the hearing on the *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 “Disclosure Statement Motion”) to October 15, 2019, at 10:00 a.m. (Pacific Time). In support of the Motion, the Debtors submit the attached *Declaration of Tania M. Moyron* (the “Moyron Declaration”) and respectfully state as follows:

I.

**JURISDICTION AND VENUE**

This Court has jurisdiction over this Motion under 28 U.S.C. § 157(b)(2)(A) and (L). Venue of these proceedings and this Motion is proper pursuant to 28 U.S.C. § 1409. The statutory predicate for this Motion is 11 U.S.C. § 105 and Rule 9013-1(m) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Central District of California (the “Local Bankruptcy Rules”).

II.

**BACKGROUND FACTS**

1. On August 31, 2018, (“Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “Cases”). By entry of an order, the Cases are currently being jointly administered before the Bankruptcy Court. [Docket No. 17]. Since the commencement of their Cases, the Debtors have been operating their businesses as debtors in possession pursuant to §§ 1107 and 1108.

2. 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”).

3. On September 4, 2019, the Debtors filed the Disclosure Statement Motion. In the

1 Disclosure Statement Motion, the Debtors seek approval of (i) the Disclosure Statement,  
2 (ii) proposed solicitation and voting procedures, (iii) proposed notice and objection procedures for  
3 confirmation of the Plan, and (iv) related relief. The Debtors also requested [Docket No. 2996]  
4 an order setting a hearing and briefing schedule on shortened notice.

5 4. On September 4, 2019, the Court entered an *Order Setting Hearing On Motion for*  
6 *Approval of Disclosure Statement for October 2, 2019, at 10:00 a.m.* [Docket No. 2998] (the  
7 “Scheduling Order”). The Scheduling Order set a hearing (the “Hearing”) on the Disclosure  
8 Statement Motion for October 2, 2019 at 10:00 a.m. and provided that any oppositions to the  
9 Disclosure Statement Motion must be filed not later than September 18, 2019. *See* Scheduling  
10 Order at 2.

11 5. On September 18, 2019, certain parties in interest filed responses and oppositions  
12 to the Disclosure Statement Motion. *See* Docket Nos. 3079, 3084, 3086, 3087, 3089, 3090, 3092,  
13 3094. Further, the Debtors have continued the opposition deadline by stipulation as they continue  
14 negotiations with certain other parties with respect to the Disclosure Statement Motion and  
15 Disclosure Statement. *See* Docket Nos. 3076, 3077, 3082, 3098, 3100.

### 16 III.

### 17 ARGUMENT

18 Local Bankruptcy Rule 9013-1(m)(1) governs motions for continuance and sets forth  
19 various general requirements. The Motion satisfies the requirements of the Local Bankruptcy  
20 Rules because it is filed more than three days prior to the Hearing, sets forth the reasons for the  
21 proposed continuance in detail, and is supported by the Moyron Declaration. *See* Local  
22 Bankruptcy Rule 9013-1(m)(1).

23 The Debtors have (i) reviewed responses to the Disclosure Statement Motion filed by the  
24 objection deadline, and (ii) reviewed and/or discussed other informal objections raised by certain  
25 parties in interest. The Debtors are now aware of the universe of potential objections to the  
26 Disclosure Statement and have already engaged in fruitful negotiations with certain parties in  
27 interest. In light of these negotiations, and the nature of the objections raised to the Disclosure  
28 Statement Motion, the Debtors believe that their disclosure statement and plan confirmation

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process will benefit from a short continuance of the Hearing on the Disclosure Statement Motion. A short continuance will not have a significant impact on the plan confirmation time frame proposed by the Debtors in the Disclosure Statement Motion. To the extent that any modifications need to be made to the timetable, the Debtors will brief that in their reply.

Further, the Debtors have informed major constituents of their requested continuance of the Hearing. The Debtors have confirmed that the Official Committee of Unsecured Creditors (the "Committee") and the Debtors' secured lenders do not object to the relief requested in this Motion. In light of the benefit to the Debtors' Cases and the non-opposition by the foregoing constituents, the Debtors respectfully request that the Court continue the hearing on the Disclosure Statement Motion from October 2, 2019, at 10:00 a.m., to **October 15, 2019, to 10:00 a.m.** (the "Continued Hearing Date"), or such other date and time as may be convenient to the Court. The proposed Continued Hearing Date coincides with the status conference in the adversary proceedings filed by the Committee. In accordance with the Local Bankruptcy Rule 9013-1(m)(4), the Continued Hearing Date will automatically extend the reply dates until October 8, 2019.

#### IV.

#### CONCLUSION

In light of the foregoing, the Debtors respectfully request that this Court enter an Order (i) granting this Motion, (ii) continuing the hearing on the Disclosure Statement Motion to October 15, 2019 at 10:00 a.m. (Pacific Time), and (iii) granting such other relief as the Court deems just and proper under the circumstances.

Dated: September 20, 2019

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

By /s/ Tania M. Moyron  
Tania M. Moyron  
Attorneys for Verity Health Systems of  
California, Inc., *et al.*

**DECLARATION OF TANIA M. MOYRON**

I, Tania M. Moyron, submit this Declaration in support of the *Motion to Continue 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* (the "Motion"),<sup>1</sup> and hereby state as follows:

1. I am an attorney duly licensed to practice before the above-entitled Court, and am a partner at Dentons US LLP ("Dentons"), counsel to Verity Health System of California, Inc. ("VHS") and the affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases (collectively, the "Debtors").

2. I have personal knowledge of the facts stated in this declaration, except as to those stated on information and believe, and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

3. The Debtors have (i) reviewed responses to the Disclosure Statement Motion filed by the objection deadline, and (ii) reviewed and/or discussed other informal objections raised by certain parties in interest. The Debtors are now aware of the universe of potential objections to the Disclosure Statement and have already engaged in fruitful negotiations with certain parties in interest. In light of these negotiations, and the nature of the objections raised to the Disclosure Statement Motion, the Debtors believe that their disclosure statement and plan confirmation process will benefit from a short continuance of the Hearing on the Disclosure Statement Motion.

4. Further, the Debtors have informed major constituents of their requested continuance of the Hearing. The Debtors confirmed that the Official Committee of Unsecured Creditors and the Debtors' secured lenders do not object to the relief requested in the Motion.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: September 20, 2019

By: /s/ Tania M. Moyron  
Tania M. Moyron

<sup>1</sup> Capitalized terms not otherwise defined in this Declaration have the definitions set forth in the Motion.