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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

**SECOND 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, 3076

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
21 “Hearing”). The Court also set September 18, 2019 as the deadline to file oppositions to the
22 Motion (the “Opposition Deadline”) and September 25, 2019 as the deadline to file replies (the
23 “Reply Deadline”) in support of the Motion. *See Scheduling Order*, ¶ 1 at 2.

24 D. On September 17, the Court entered the *Order Approving Stipulation Continuing*
25 *Deadlines Related to Any Response to the Debtors’ Motion to Approve Disclosure Statement filed*
26 *by the Pension Benefit Guaranty Corporation* [Docket No. 3076], which extended the Opposition
27 Deadline to September 23, 2019 and extended the Reply Deadline to September 30, 2019, at
28 12:00 p.m. (Pacific Time).

1 E. On September 20, 2019, the Debtors filed a motion [Docket No. 3103] (the
2 "Continuance Motion") to continue the Hearing on the Motion to October 15, 2019, at 10:00 a.m.
3 (Pacific Time). As of the date of this Stipulation, the Court has not entered an order on the
4 Continuance Motion.

5 F. The Parties continue to engage in negotiations concerning the Disclosure
6 Statement and Plan, and jointly agree to further extend the Opposition Deadline and Reply
7 Deadline to allow additional time to engage in negotiations.

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

10 1. The Opposition Deadline for the PBGC shall be extended from September 23,
11 2019 to September 26, 2019.

12 2. The Reply Deadline for the Debtors, with respect to any opposition or response to
13 the Motion filed by the PBGC, shall be extended from September 30, 2019 at 12:00 p.m. (Pacific
14 Time) to such date and time set for replies by the Court's order on the Continuance Motion,
15 unless otherwise agreed by the Parties by a separate stipulation.

16
17 Dated: September 21, 2019

DENTONS US LLP

18 By: /s/ Tania M. Moyron

19 Tania M. Moyron

20 Counsel to the Debtors and Debtors in Possession

21 Dated: September 21, 2019

PENSION BENEFIT GUARANTY CORPORATION
OFFICE OF THE GENERAL COUNSEL

22
23 By: _____

24 Lori Butler

25 Counsel to the Pension Benefit Guaranty Corporation
26
27
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Tania M. Moyron

Counsel to the Debtors and Debtors in Possession

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PENSION BENEFIT GUARANTY CORPORATION
OFFICE OF THE GENERAL COUNSEL

19 By: Lori Butler

Lori Butler

Counsel to the Pension Benefit Guaranty Corporation