

SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
NICHOLAS A. KOFFROTH (Bar. No. 287854)
nicholas.koffroth@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Tel: (213) 623-9300 / Fax: (213) 623-9924

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

**FOURTH 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, 3077,
3119, 3126**

Current 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



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. On September 17, 2019, the Court entered the *Order Approving 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* [Docket No.

3077], which extended the Opposition Deadline to September 20, 2019 and extended the Reply Deadline to September 27, 2019.

E. On September 24, 2019, the Court entered the *Order Approving Second 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* [Docket No. 3119], which extended the Opposition Deadline to September 24, 2019 and extended the Reply Deadline to September 30, 2019, at 12:00 p.m. (Pacific Time).

F. On September 24, 2019, the Court entered the *Order Approving Third 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* [Docket No. 3126], which extended the Opposition Deadline to October 1, 2019 and extended the Reply Deadline to October 8, 2019.

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

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

1. The Opposition Deadline for Old Republic and the Chubb Companies shall be extended from October 1, 2019 to October 7, 2019.

2. The Reply Deadline for the Debtors shall be extended from October 8, 2019 to October 11, 2019 with respect to any opposition or response to the Motion filed by Old Republic or the Chubb Companies.

///

///

///

///

///

///

1 Dated: September 27, 2019

DENTONS US LLP

2
3 By: /s/ Tania M. Moyron

Tania M. Moyron

4 Counsel to the Debtors and Debtors in Possession

5 Dated: September 27, 2019

FOX SWIBEL LEVIN & CARROLL LLP

6
7 By: _____

Margaret M. Anderson

8 Counsel to Old Republic Insurance Company

9
10 Dated: September 27, 2019

DUANE MORRIS LLP

11
12 By: _____

Marcus O. Colabianchi

13 Counsel to the Chubb Companies

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1 Dated: September 27, 2019

DENTONS US LLP

2
3 By: _____

Tania M. Moyron

4 Counsel to the Debtors and Debtors in Possession

5 Dated: September 27, 2019

FOX SWIBEL LEVIN & CARROLL LLP

6
7 By:   _____

Margaret M. Anderson

8 Counsel to Old Republic Insurance Company

9
10 Dated: September 27, 2019

DUANE MORRIS LLP

11
12 By: _____

Marcus O. Colabianchi

13 Counsel to the Chubb Companies

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1 Dated: September 27, 2019

DENTONS US LLP

2

3

By: _____

Tania M. Moyron

4

Counsel to the Debtors and Debtors in Possession

5

Dated: September 27, 2019

FOX SWIBEL LEVIN & CARROLL LLP

6

7

By: _____

Margaret M. Anderson

8

Counsel to Old Republic Insurance Company

9

10

Dated: September 27, 2019

DUANE MORRIS LLP

11

12

By:  _____

Marcus O. Colabianchi

13

Counsel to the Chubb Companies

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28