

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

**FIFTH 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, 3195**

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 Granting 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* [Docket No. 3120], which granted the Debtors' first request to continue the hearing on the Motion to October 15, 2019, at 10:00 a.m. (Pacific Time).

G. 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.

H. On October 1, 2019, the Court entered the *Order Approving 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* [Docket No. 3195], which extended the Opposition Deadline to October 7, 2019 and extended the Reply Deadline to October 11, 2019.

I. On October 4, 2019, the Debtors filed 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 in Light of Court's Ruling on Emergency Motion* [Docket No. 3238] (the "Second Continuance Motion"). In the Second Continuance Motion, the Debtors request that

the Court continue the Hearing to October 23, 2019, at 10:00 a.m. (Pacific Time). As of the date of this Stipulation, the Court has yet to enter an order on the Second Continuance Motion.

J. 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 7, 2019 to October 11, 2019.

2. The Reply Deadline for the Debtors shall be extended from October 11, 2019 to October 16, 2019 with respect to any opposition or response to the Motion filed by Old Republic or the Chubb Companies.

Dated: October 4, 2019

DENTONS US LLP

By: /s/ Tania M. Moyron

Tania M. Moyron

Counsel to the Debtors and Debtors in Possession

Dated: October 4, 2019

FOX SWIBEL LEVIN & CARROLL LLP

By: _____

Margaret M. Anderson

Counsel to Old Republic Insurance Company

Dated: October 4, 2019

DUANE MORRIS LLP

By: _____

Marcus O. Colabianchi

Counsel to the Chubb Companies

1 the Court continue the Hearing to October 23, 2019, at 10:00 a.m. (Pacific Time). As of the date
2 of this Stipulation, the Court has yet to enter an order on the Second Continuance Motion.

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

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

8 1. The Opposition Deadline for Old Republic and the Chubb Companies shall be
9 extended from October 7, 2019 to October 11, 2019.

10 2. The Reply Deadline for the Debtors shall be extended from October 11, 2019 to
11 October 16, 2019 with respect to any opposition or response to the Motion filed by Old Republic
12 or the Chubb Companies.

13
14 Dated: October 4, 2019

DENTONS US LLP

15 By: _____

16 Tania M. Moyron

17 Counsel to the Debtors and Debtors in Possession

18 Dated: October 4, 2019

FOX SWIBEL LEVIN & CARROLL LLP

19 By:  _____

20 Margaret M. Anderson

21 Counsel to Old Republic Insurance Company

22
23 Dated: October 4, 2019

DUANE MORRIS LLP

24 By: _____

25 Marcus O. Colabianchi

26 Counsel to the Chubb Companies
27
28

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2 of this Stipulation, the Court has yet to enter an order on the Second Continuance Motion.

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

6 NOW, THEREFORE, all of the Parties to this Stipulation hereby stipulate and agree as
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8 1. The Opposition Deadline for Old Republic and the Chubb Companies shall be
9 extended from October 7, 2019 to October 11, 2019.

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11 October 16, 2019 with respect to any opposition or response to the Motion filed by Old Republic
12 or the Chubb Companies.

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15 By: _____

Tania M. Moyron

16 Counsel to the Debtors and Debtors in Possession

17 Dated: October 4, 2019

FOX SWIBEL LEVIN & CARROLL LLP

19 By: _____

Margaret M. Anderson

20 Counsel to Old Republic Insurance Company

21 Dated: October 4, 2019

DUANE MORRIS LLP

23 By: _____

Marcus O. Colabianchi

24 Counsel to the Chubb Companies