

Steven J. Kahn (CA Bar No. 76933)  
PACHULSKI STANG ZIEHL & JONES LLP  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, California 90067  
Telephone: 310/277-6910  
Facsimile: 310/201-0760  
E-mail: skahn@pszjlaw.com

Co-Counsel to 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 Dialysis, 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. Ernest M. Robles

Adversary No. 2:19-ap-01042-ER

**UPDATED STIPULATION REGARDING  
TIMING OF MEDIATION**

**[ORDER LODGED CONCURRENTLY  
HEREWITH]**

[No Hearing Required]



1 VERITY HEALTH SYSTEM OF CALIFORNIA,  
2 INC., a California nonprofit public benefit  
3 corporation, ST. VINCENT MEDICAL CENTER, a  
4 California nonprofit public benefit corporation and  
5 ST. FRANCIS MEDICAL CENTER, a California  
6 nonprofit public benefit corporation,

7 Plaintiffs,

8 v.

9 HERITAGE PROVIDER NETWORK, INC., a  
10 California corporation,

11 Defendant.

12 The parties to this Stipulation, Plaintiffs, Verity Health System of California, Inc., St.  
13 Vincent Medical Center, and St. Francis Medical Center, ("Plaintiffs"), on the one hand, and  
14 Heritage Provider Network, Inc., ("Defendant"), on the other hand (Plaintiffs and Defendant  
15 collectively, the "Parties"), hereby stipulate (the "Stipulation") as follows:

16 **RECITALS**

17 1. At the initial Status Conference in this adversary proceeding on May 14, 2019, the  
18 Parties advised the Court that they agreed to participate in mediation after sufficient discovery had  
19 been completed.

20 2. As reflected in the Court's Scheduling Order, as amended on July 19, 2019 [Docket  
21 No. 31], the Court referred this matter to the Mediation Panel as of the date of the initial Status  
22 Conference.

23 3. In furtherance thereof, the Parties selected Alan Ickowitz as mediator, and he has  
24 accepted that appointment.

25 4. On July 29, 2019, the Parties and the mediator conferred and determined that the  
26 Parties would be prepared to participate in a mediation session between October 28, 2019 and  
27 November 15, 2019.

28 5. On August 22, 2019, the Court entered its *Order on Stipulation Regarding Timing of  
Mediation* providing that mediation begin between October 28, 2019 and November 15, 2019  
[Docket No. 34].

6. Thereafter, on October 2, 2019, the Court entered its *Order on Stipulation Extending Litigation Deadlines and Continuing Pre-Trial Conference and Trial Week Dates* [Docket No. 40], which in part extended the discovery cut-off from January 27, 2020 to March 18, 2020, the Pre-Trial Conference from February 1, 2020 to April 15, 2020 and the Trial Week from February 24, 2020 to April 27, 2020.

7. In light of the extended dates, and to facilitate a meaningful mediation after the completion of sufficient discovery, the Parties hereto request that the Court reset the window for a mediation session.

### **STIPULATION**

1. It is therefore stipulated between the Parties that a mediation of this adversary proceeding shall proceed on a date to be determined by the Parties between January 13, 2020 and February 19, 2020.

2. So as to establish the timing of the Mediator's reporting obligations, the Parties request the Court enter an order confirming the new timing of the mediation.

PACHULSKI STANG ZIEHL & JONES LLP

Dated: October 4, 2019

/s/ Steven J. Kahn

Steven J. Kahn

Co-Counsel to Chapter 11 Debtors and  
Debtors in Possession and Counsel for Plaintiffs

Dated: October 4, 2019

LESLIE COHEN LAW, PC

By: 

Leslie A. Cohen.

Attorneys for Defendant

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

A true and correct copy of the foregoing document entitled (*specify*): **UPDATED STIPULATION REGARDING TIMING OF MEDIATION** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **October 4, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;odalys@lesliecohenlaw.com
- Steven J Kahn skahn@pszyjw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **October 4, 2019**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA HAND DELIVERY**

Honorable Ernest M. Robles  
U.S. Bankruptcy Court  
255 E. Temple Street, Suite 1560 / Courtroom 1568  
Los Angeles, CA 90012

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 4, 2019  
*Date*

Mary de Leon  
*Printed Name*

/s/ Mary de Leon  
*Signature*