

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address SAMUEL R. MAIZEL (Bar No. 189301) samuel.maizel@dentons.com TANIA M. MOYRON (Bar No. 235736) tania.moyron@dentons.com DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 Tel: (213) 623-9300 / Fax: (213) 623-9924 <input checked="" type="checkbox"/> Attorney for: Chapter 11 Debtors	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: VERITY HEALTH SYSTEM OF CALIFORNIA, INC., et al., Debtor(s).	CASE NO.: 2:18-bk-20151-ER CHAPTER: 11 NOTICE OF OBJECTION TO CLAIM DATE: 11/20/2019 TIME: 10:00 am COURTROOM: 1568 PLACE: 255 E. Temple Street Los Angeles, CA 90012

1. TO (specify claimant and claimant's counsel, if any): DORIS THOMPSON, with respect to KCC Claim No. 5551 and ECF Claim No. 2436, filed against Verity Health System Of California, Inc. and St. Vincent Medical Center
2. NOTICE IS HEREBY GIVEN that the undersigned has filed an objection to your Proof of Claim (Claim #2436/5551) filed in the above referenced case. The Objection to Claim seeks to alter your rights by disallowing, reducing or modifying the claim based upon the grounds set forth in the objection, a copy of which is attached hereto and served herewith.
3. **Deadline for Opposition Papers:** You must file and serve a response to the Objection to Claim not later than 14 days prior to the hearing date set forth above.

IF YOU FAIL TO TIMELY RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Date: 10/21/2019

Dentons US LLP
Printed name of law firm

/s/ Tania M. Moyron
Signature

Date Notice Mailed: 10/21/2019

Tania M. Moryon
Printed name of attorney for objector



SAMUEL R. MAIZEL (Bar No. 189301)
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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

**DEBTORS' MOTION TO DISALLOW CLAIM NO.
5551 FILED BY DORIS THOMPSON;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
RICHARD G. ADCOCK IN SUPPORT
THEREOF**

HEARING:

Date: November 20, 2019

Time: 10:00 a.m.

Place: Courtroom 1568

255 E. Temple Street, Los Angeles, CA 90012

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1 Verity Health System Of California, Inc. (“VHS”) and the above-referenced affiliated
2 debtors and debtors in possession in the above captioned chapter 11 bankruptcy cases (collectively,
3 the “Debtors”), hereby move (the “Motion”) for the entry of an order disallowing Proof of Claim
4 No. 5551 (the “Claim”)¹ filed by Doris Thompson (the “Claimant”) in VHS’s and St. Vincent
5 Medical Center’s bankruptcy cases, in its entirety. The Claimant asserts a general unsecured claim
6 in the amount of \$50 million, listing the following basis for the Claim: “sodmized, (2) rapes,
7 unknown surgery and unlawful surgery, given Drugs in I.V. I seen the Doctors involved.” The
8 Claimant, however, has not established by a preponderance of the evidence that the Claim should
9 be allowed. The Claim also fails to state a viable and legally recognized cause of action and the
10 police report and other scant documentation attached to the Claim do not establish that the Claimant
11 is entitled to an allowed Claim in the amount of \$50 million. Therefore, the Claim should be
12 disallowed under Federal Rule of Civil Procedure 12(b)(6) or its state law equivalent. The Debtors
13 also have no record of the existence of such Claim. The Claim should also be disallowed for failure
14 to prosecute and laches and because the Claim does not provide a calculation or basis for Claimant’s
15 \$50 million of alleged damages. Pursuant to this Motion, the Debtors request that the Court enter
16 an order disallowing the Claim in its entirety. A true and correct copy of the Claim is attached as
17 **Exhibit “A”** to the annexed Declaration of Richard G. Adcock.

18 The objection made by way of this Motion seeks to alter the Claimant’s rights by disallowing
19 the Claim based on the grounds set forth in the annexed memorandum of points and authorities (the
20 “Memorandum”). The Memorandum and the specific comments about the Claim should be
21 reviewed in order to fully understand the basis for the objection to the Claim.

22

23

24

25 ¹ The Claim is denominated on the Kurtzman Carson Consultants LLC (“KCC”) claim registry as
26 Claim No. 5551 and denominated on the Court’s Case Management/Electronic Case Files claim
27 registry as Claim No. 2436. On September 10, 2018, the Court entered the *Order Approving (A)*
28 *Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent, and (B) Approving*
the Form and Manner of Notice of Case Commencement and 341(a) Meeting of Creditors [Docket
No. 153], which, among other things, authorized KCC to maintain the official claim register for
these Cases. Accordingly, the Debtors reference the Claim as denominated on the KCC claim
registry.

DEADLINE FOR OPPOSITION PAPERS: Pursuant to Local Bankruptcy Rules 3007-1(b)(3)(A) and 9013-1(o), a response to this Motion must be filed with the Court, and served upon Debtor's counsel, at the address set forth on the first page of this Notice, not later than fourteen (14) days prior to the hearing date set forth above.

PURSUANT TO LOCAL BANKRUPTCY RULE 3007-1(b)(3)(B), IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED ON THIS MOTION WITHOUT FURTHER NOTICE OR HEARING.

WHEREFORE, the Debtors respectfully request that the Court enter an order: (a) granting this Motion in its entirety, (b) disallowing the Claim as set forth herein, and (c) granting such other and further relief that may be appropriate.

Dated: October 21, 2019

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

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

Attorneys for the Chapter 11 Debtors and
Debtors In Possession

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

INTRODUCTION

Verity Health System Of California, Inc. (“VHS”) and the above-referenced affiliated debtors and debtors in possession in the above captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), hereby move (the “Motion”) for the entry of an order disallowing Proof of Claim No. 5551 (the “Claim,” as further described herein)² filed by Doris Thompson (the “Claimant”) in VHS’s and St. Vincent Medical Center’s bankruptcy cases, in its entirety. The Claimant asserts a general unsecured claim in the amount of \$50 million, listing the following basis for the Claim: “sodmized, (2) rapes, unknown surgery and unlawful surgery, given Drugs in I.V. I seen the Doctors involved.” The Claim, however, fails to state viable and legally recognized cause of action and the police report and other documentation attached to the Claim fails to establish that the Claimant is entitled to an allowed Claim in the amount of \$50 million. Therefore, the Claim should be disallowed under Federal Rule of Civil Procedure 12(b)(6) or its state law equivalent. The Debtors also have no record of the existence of such Claim. The Claim should also be disallowed for failure to prosecute and laches and because the Claim does not provide a calculation or basis for Claimant’s \$50 million of alleged damages. Pursuant to this Motion, the Debtors request that the Court enter an order disallowing the Claim in its entirety.

² The Claim is denominated on the Kurtzman Carson Consultants LLC (“KCC”) claim registry as Claim No. 5551 and denominated on the Court’s Case Management/Electronic Case Files claim registry as Claim No. 2436. On September 10, 2018, the Court entered the *Order Approving (A) Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent, and (B) Approving the Form and Manner of Notice of Case Commencement and 341(a) Meeting of Creditors* [Docket No. 153], which, among other things, authorized KCC to maintain the official claim register for these Cases. Accordingly, the Debtors reference the Claim as denominated on the KCC claim registry.

1 II.

2 **JURISDICTION AND VENUE**

3 This Court has jurisdiction over this Motion under 28 U.S.C. § 157(b)(2)(A), (B) and (O).
4 Venue of these proceedings and this Motion is proper pursuant to 28 U.S.C. § 1409. The statutory
5 predicate for this Motion is § 502(b) of the Bankruptcy Code³ and Bankruptcy Rules 3001 and 3007.

6 III.

7 **BACKGROUND**

8 **A. General Background**

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

14 2. Debtor VHS, a California nonprofit public benefit corporation, is the sole corporate
15 member of five Debtor California nonprofit public benefit corporations that operated O’Connor
16 Hospital and Saint Louise Regional Hospital, and currently operates St. Francis Medical Center, St.
17 Vincent Medical Center and Seton Medical Center, including Seton Medical Center Coastsides
18 Campus (collectively, the “Hospitals”).

19 3. On the Petition Date, VHS, the Hospitals, and their affiliated entities operated as a
20 nonprofit health care system, with approximately 1,680 inpatient beds, six active emergency rooms,
21 a trauma center, eleven medical office buildings, and a host of medical specialties, including tertiary
22 and quaternary care. *See Declaration Of Richard G. Adcock In Support of Emergency First Day*
23 *Motions*, at 4, 12 (the “First Day Declaration”) [Docket No. 8]. The scope of the services provided
24 by the Verity Health System is exemplified by the fact that in 2017, the Hospitals provided medical
25 services to over 50,000 inpatients and approximately 480,000 outpatients. *Id.*, at 4, 12.

26 _____
27 ³ Unless specified otherwise, all chapter and section references are to the Bankruptcy Code, 11
28 U.S.C. §§ 101-1532, and all “Bankruptcy Rule” references are to the Federal Rules of Bankruptcy
Procedure, Rules 1001-9037. All “LBR” references are to the Local Bankruptcy Rules for the
United States Bankruptcy Court for the Central District of California.

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4. A detailed description of the Debtors' businesses, capital structure, and the events leading to the commencement of these Cases is contained in the First Day Declaration.

5. On September 17, 2018, the U.S. Trustee appointed a statutory creditors' committee pursuant to § 1102. *See* Docket No. 197.

6. No trustee or examiner has been appointed in these Cases.

7. On December 27, 2018, the Court entered an order [Docket No. 1153] approving the sale of two of the Debtors hospitals to Santa Clara County—Saint Louise Regional Hospital and O'Connor Hospital (the "Santa Clara Sale"). The sale closed on February 28, 2019. The Court also has approved other sales related to Verity Medical Foundation. *See* Docket Nos. 1622, 1915, 1919, 2693.

8. On May 2, 2019, the Bankruptcy Court entered the *Order (A) Authorizing The Sale Of Certain Of The Debtors' Assets To Strategic Global Management, Inc. Free And Clear Of Liens, Claims, Encumbrances, And Other Interests; (B) Approving The Assumption And Assignment Of An Unexpired Lease Related Thereto; And (C) Granting Related Relief* [Docket No. 2306], which authorized the sale of the Debtors' four remaining Hospitals to Strategic Global Management, Inc. (the "SGM Sale").

9. On February 11, 2019, the Court entered its order setting the deadline for filing proofs of claims in the Cases (the "Bar Date Order") [Docket No. 1528]. The Court established April 1, 2019 as the bar date, with certain limited exclusions as specified in the Bar Date Order.

10. On September 3, 2019, the Debtors filed the *Debtors' Chapter 11 Plan of Liquidation* (the "Plan") [Docket No. 2993] and the *Disclosure Statement Describing Debtors' Chapter 11 Plan of Liquidation* [Docket No. 2994]. The Plan sets forth a proposal for the resolution of Claims and the distribution of proceeds to Holders of Allowed Claims.⁴

B. Claim No. 5551 Filed By Doris Thompson

9. On April 1, 2019, Claimant filed a pro se proof of claim (Claim No. 5551) for \$50 million against VHS and St. Vincent Medical Center (the "Claim"). The basis stated for Claim is

⁴ All capitalized terms not otherwise defined in this paragraph shall have the meaning set forth in the Plan.

1 “sodmized, (2) rapes, unknown surgery and unlawful surgery, given Drugs in I.V. I seen the Doctors
2 involved.” Claimant also (i) checked “no” in box 9 of the proof of claim form as to whether the
3 Claim is secured, (ii) listed the Claim as an unsecured claim in the amount of the Claim of \$50
4 million, and a “blank” amount for any secured portion in box 9, and (iii) also checked in box 9
5 “Other” and stated “F.B.I. is investigating ‘Please,’ Don’t include this case”. A copy of the Claim
6 is attached to the Declaration of Richard G. Adcock in support of this Motion as **Exhibit “A.”**

7 10. The Debtors searched their books, records and occurrence reports and did not find
8 any evidence supporting the existence of the Claim.

9 **IV.**

10 **LEGAL STANDARD**

11 Bankruptcy Rule 3001(a) provides that a proof of claim is a written statement setting forth
12 a creditor’s claim. Fed. R. Bankr. P. 3001(a). Bankruptcy Rule 3001(f) provides that a proof of
13 claim executed and filed in accordance with “these rules” shall constitute prima facie evidence of
14 the validity and amount of the claim. Fed. R. Bankr. P. 3001(f); *see also In re Southern Cal. Plastics,*
15 *Inc.*, 165 F.3d 1243, 1247-48 (9th Cir. 1999); *In re Garner*, 246 B.R. 617, 620-21 (9th Cir. B.A.P.
16 2000).

17 However, Bankruptcy Rule 3001(f) “operates merely as an evidentiary presumption that is
18 rebuttable.” *In re Garvida*, 347 B.R. 697, 706 (9th Cir. B.A.P. 2006). Once the debtor satisfies its
19 burden of going forward by rebutting the presumption with counter-evidence, the burden of going
20 forward shifts to the claimant. *In re Lundell*, 223 F.3d 1035, 1039 (9th Cir. 2000); *Garvida*, 347
21 B.R. at 706-708. While the “burden of going forward is primarily a procedural matter pertaining to
22 the order of presenting evidence,” the substantive burden of proof remains at all times upon the
23 claimant. *Garvida*, 347 B.R. at 706; *Lundell*, 223 F.3d at 1039 (ultimate burden of persuasion
24 remains at all times upon the claimant); *So. Cal. Plastics*, 165 F.3d at 1248.

25 A claimant must establish by a preponderance of the evidence that its claim should be
26 allowed. *Lundell*, 223 F.3d at 1039. The objecting party is not required to disprove the claim. *In*
27 *re Kahn*, 114 B.R. 40 (Bankr. S.D. N.Y. 1990). The Bankruptcy Court has the power to “sift” the
28 circumstances surrounding any claim to see that injustice or unfairness is not done in the

administration of the bankruptcy estate. *Pepper vs. Litton*, 308 U.S. 295, 304, 60 S.Ct. 238, 244 (1939).

In *In re Circle J. Dairy, Inc.*, 112 B.R. 297 (W.D. Ark. 1989), the court held that:

A claim, to be legally sufficient and, therefore, to be prima facie valid, under the Bankruptcy Rules, must:

- 1) be in writing;
- 2) make a demand on the debtor's estate;
- 3) express the intent to hold the debtor liable for the debt;
- 4) be properly filed; and
- 5) be based upon facts which would allow, as a matter of equity, to have the document accepted as a proof of claim.

Id. at 299-300 (citation omitted).

The court in *In re Circle J. Dairy, Inc.*, further explained that:

Under the fifth requirement, the allegations of the proof of claim must set forth all the necessary facts to establish a claim and must not be self-contradictory. The prima facie validity of the claim does not attach unless the claim is in compliance with the [Bankruptcy Rules], including [Bankruptcy Rule] 3001, and sets forth the facts necessary to support the claim. These requirements for legal sufficiency are consistent with the idea that the proof of claim itself is to be scrutinized with an eye to credibility.

Id. at 300 (citations omitted).

V.

ARGUMENT

The Court should disallow the Claim in its entirety for the following reasons:

a. In support of a Claim in the alleged amount of \$50 million, Claimant attaches, as the only evidence in support of her Claim, a police report and handwritten description of her Claim that falls woefully short of satisfying her procedural and substantive burden as to the allowance of the Claim.

b. The Claim is also not well pled and is not sufficient to state a viable and legally recognized cause of action. Therefore, the Claim should be disallowed under Federal Rule of Civil Procedure 12(b)(6) or its state law equivalent. This Court has jurisdiction to disallow a personal injury tort claim against a chapter 11 estate, such as the Claim at issue, on the basis that the claim is legally invalid on its face. *See In re UAL Corp*, 310 B.R. 373 (N.D. Ill. 2004); *see also In re Amtrol*

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1 *Holdings, Inc.*, 384 B.R. 686, 690 (Bankr. D. Del. 2008), *subsequently rev'd on other grounds*, 532
2 F. App'x 316 (3d Cir. 2013) (“bankruptcy courts are authorized to determine the validity of a
3 personal injury claim but not the amount”); *In re Standard Insulations, Inc.*, 138 B.R. 947, 951
4 (Bankr. W.D. Mo. 1992) (“the bankruptcy court may conduct a threshold inquiry on the limited
5 issue of whether personal injury claimants have allowable claims, so long as the court stops short of
6 liquidating those claims it allows . . .”).

7 c. The police report reporting rape with the Los Angeles Police Department, as attached
8 to the Claim, reports the “Date and Time of Occurrence” as “10/07/2012 7:30 and 10/07/2012
9 12:30” and the “Date and Time Report to PD” as “07/23/2015 17:15”. Thus, the alleged rape
10 occurred nearly 6 years before the Petition Date and the alleged incident was not reported to the Los
11 Angeles Police Department until over two and a half years after the alleged incident. Thus, Claimant
12 failed to timely pursue and report her cause of action and it is barred by the statute of limitations.
13 *See* Cal. Civ. Proc. Code § 335.1 (West) (statute of limitations is two years from discovery of injury
14 for personal injury claims).

15 d. Further, the Claim lacks factual merit and the Claimant cannot establish and has not
16 established by a preponderance of the evidence that the Claim should be allowed. The Debtors
17 searched their books, records and occurrence reports and did not find any evidence supporting the
18 existence of the Claim. Also, Claimant has provided no basis or calculation for her alleged damages
19 of \$50 million

20 e. Further, there is no sign Claimant has engaged an attorney or expert witness or filed
21 suit to pursue her alleged claim since 2012 nor since filing her Claim nor has she moved to lift the
22 automatic stay in these Cases to pursue her claim. Thus, the Claim should be disallowed for failure
23 to prosecute and laches. *See Couveau v. Am. Airlines, Inc.*, 218 F.3d 1078, 1083 (9th Cir. 2000)
24 (laches may bar a claim for damages if there is an unreasonable delay by the plaintiff and prejudice
25 to the defendant).

26 f. It appears from the Claim that Claimant does not assert the Claim is secured. In any
27 event, she provides no supporting documents, description of collateral or its value or other facts
28 which would show she asserts a valid and perfected secured claim. The Debtors’ claim agent only

1 categorized the Claim as potentially secured out of an abundance of caution. The Debtors request
2 that this Court find that the Claim is not secured.

3 **VI.**

4 **RESERVATION OF RIGHTS**

5 The Debtors expressly reserve the right to amend, modify or supplement this Motion or file
6 a new Motion to assert additional objections to the Claim or any other proofs of claim (filed or not)
7 that may be asserted by Claimant. Should the grounds for disallowance of the Claim as stated in
8 this Motion be deemed insufficient, the Debtors reserve their right to object to the Claim on any
9 other grounds.

10
11 **VII.**

12 **CONCLUSION**

13 For the reasons set forth above, the Debtors respectfully request that the Court enter an order
14 (i) granting the Motion in its entirety; (ii) sustaining the Debtors' objection to the Claim and
15 disallowing the Claim in its entirety; and (iii) granting such other and further relief the Court deems
16 just and proper.

17 Dated: October 21, 2019

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

18
19
20
21 By /s/ Tania M. Moyron
Tania M. Moyron

22 Attorneys for the Chapter 11 Debtors and
23 Debtors In Possession
24
25
26
27
28

DECLARATION OF RICHARD G. ADCOCK

I, Richard G. Adcock, declare, that if called as a witness, I would and could competently testify thereto, of my own personal knowledge, as follows:

1. I am the Chief Executive Officer of Verity Health System of California, Inc. (“VHS”). I became the Debtors’ Chief Executive Officer effective January 2018. Prior thereto, I served as VHS’s Chief Operating Officer since August 2017.

2. Except as otherwise indicated herein, this Declaration is based upon my personal knowledge, my review of relevant documents, information provided to me by employees of the Debtors or the Debtors’ legal and financial advisors, or my opinion based upon my experience, knowledge, and information concerning the Debtors’ operations and the healthcare industry. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

3. On April 1, 2019, Doris Thompson (“Claimant”) filed a pro se proof of claim in Verity Health System of California, Inc. and St. Vincent Medical Center bankruptcy case, which claim is denominated on the Kurtzman Carson Consultants LLC claim registry as Claim No. 5551 (the “Claim”). A true and correct copy of the Claim is attached hereto as **Exhibit “A”** and is incorporated herein by reference.

4. The Debtors deny the allegations in the Claim which lack factual merit. The Debtors searched their books, records and occurrence reports and did not find any evidence supporting the existence of the Claim.

5. The Debtors searched their litigation records and did not find any evidence that the Claimant has filed a lawsuit or other legal proceeding concerning the allegations asserted in the Claim.

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

Executed this 21st day of October, 2019, at Los Angeles, California.



RICHARD G. ADCOCK

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Exhibit “A”

Copy of the Proof of Claim the Subject of the Motion

United States Bankruptcy Court for the Central District of California

Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)

- ☒ Verity Health System of California, Inc. (Case No. 18-20151) ☐ St. Francis Medical Center of Lynwood Foundation (Case No. 18-20178)
- ☐ De Paul Ventures – San Jose Dialysis, LLC (Case No. 18-20181) ☐ St. Louise Regional Hospital (Case No. 18-20162)
- ☐ De Paul Ventures, LLC (Case No. 18-20176) ☐ St. Vincent Dialysis Center, Inc. (Case No. 18-20171)
- ☐ O'Connor Hospital (Case No. 18-20168) ☐ St. Vincent Foundation (Case No. 18-20180)
- ☐ O'Connor Hospital Foundation (Case No. 18-20179) ☒ St. Vincent Medical Center (Case No. 18-20164)
- ☐ Saint Louise Regional Hospital Foundation (Case No. 18-20172) ☐ Verity Business Services (Case No. 18-20173)
- ☐ Seton Medical Center (Case No. 18-20167) ☐ Verity Holdings, LLC (Case No. 18-20163)
- ☐ Seton Medical Center Foundation (Case No. 18-20175) ☐ Verity Medical Foundation (Case No. 18-20169)
- ☐ St. Francis Medical Center (Case No. 18-20165)

Official Form 410 Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. Who is the current creditor?

Doris Thompson
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

☒ No
☐ Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Doris Thompson
Name
822 N. Hazard Ave #504
Number Street
L.A. CA. 90063
City State ZIP Code
L.A.
Country
(323) 685-7158
Contact phone
N
Contact email

Where should payments to the creditor be sent? (if different)

Doris Thompson
Name
822 N. Hazard Ave #504
Number Street
L.A. CA. 90063
City State ZIP Code
L.A.
Country
(323) 685-7158
Contact phone
N
Contact email

Federal Rule of
Bankruptcy Procedure
(FRBP) 2002(g)

RECEIVED

APR 01 2019

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

None

4. Does this claim amend one already filed?

☒ No
☐ Yes. Claim number on court claims registry (if known) _____

Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☒ No
☐ Yes. Who made the earlier filing? _____

- ☒ Date Stamped Copy Returned
☐ No self addressed stamped envelope
☐ No copy to return



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>2361</u>
7. How much is the claim? \$ <u>50,000,000.00</u>	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Sodmized, (2) Rapes, unknown Surgery and unlawful Surgery, given Drugs in I.V.</u>
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <u>I seen the Doctors involved.</u> <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input checked="" type="checkbox"/> Other. Describe: <u>F.B.I is investigating "Please, Dont include this case"</u> Basis for perfection: Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ <u>50,000.000.00</u> (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ <u>50,000.000.00</u> Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input checked="" type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

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12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☐ No

☒ Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☒ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ 50,000.000.00

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

Doris M. Thompson

3-25-19

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

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

Executed on date

03 25 2019
MM / DD / YYYY

Doris M. Thompson
Signature

Print the name of the person who is completing and signing this claim:

Name

DORIS Marie Thompson
First name Middle name Last name

Title

Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

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Address

822 N. Hazard Ave #504
Number Street
Los Angeles CA 90063 L.A.
City State ZIP Code Country

KURTZMAN CARSON CONSULTANTS

Contact phone

(323) 685-7158

Email

None

Lead Case No.
2:18-bk-20151-ER

3-25-19

To: United States Bankruptcy Court
Los Angeles Division

From: Doris Marie Thompson
822 N. Hazard Ave #504
L.A., CA. 90063
PH: (323) 685-7158

I'm, Doris Thompson, Please don't
let this Hospital get away with
this, "In God name".

I had a Heart Attack on July 7, 2012
after, I had 7 attempts of another
Heart, I made it to the ER just
in time all seven times. The last
one, I went to St. Vincent ER, I
was in I.C.U. for 5 days. When
released to the 5th Floor, I
met the Doctor, Dr. ~~XXXXXXXXXXXX~~
this is the name he gave me. This
doctor made me a victim, On 10-7-2012
they done surgery to place a Cardio.
Defibrillator, this doctor told me
I will die without it. After the surgery
I was put in a Large Storing room
with lots of Large medical equipments
all on wheels with Drapes from ceiling
to floor. I became alert, but I could

not, move, I can not open my eyes, but, I can hear and feel.

When I come too, I felt something going in my Vaginitis, The doctor got in my bed, he sodomized me and rape me, when finish, He sayed "(Darling Doris)". I was then moved to another room where an unauthorized surgery, where a whole was burned on rightside of my navel on my abdomen. I was moved to another room where I was raped again, My eyes come open, I saw, Doctor ~~XXXXXX~~ standing there, naked, ~~holding~~ holding his penis in both hands, looking up at ceiling, saying God Damn! I, closed my eyes when he was dropping his head, I still could not move my body, I couldn't feel my legs or feet. He told the Dr. Head of Surgery at St. Vincent Medical Center, what happen to me, I ask him, "Please, Don't tell Dr. ~~XXXXXX~~, what I told him, I was afraid, But, he did, He told him and told him to resign. He did, he work at, Good Samaritan Hospital 1225 Wilshire Bl. in Los Angeles. This doctor would, park his car and himself in front of my Apartment, He

(3)

have called my house, at that time
it (323) 233-0782, Lots of times, at
3:00 AM, and all times of days and
nights, first time, He said, You are
my Kind of Lady, the rest, Just
breath in the phone. One Saturday,
about 2:00 p.m., I let my guard down,
went to a Gas Station, And he
followed me there, and came in
the station, I was in Line, He was
trying to talk to me, but, I know
it was him, I didn't say anything.
So, He going out the door saying,
I would give my Dog more respect
then you. "I was afreaded." The last
time, I seen him was, Aug. 13 2018,
he was in my building where I moved,
He have called my new phone number,
I don't know how he got my number,
He makes mumbling sounds. I have
called, Rampa Police, to let them
know, He is still bothering me.

I tried very hard to get someone to
handled my case, "No One Believe"
me!!, ~~One~~ know one gave me No
advise on what to do. I was very
sick, as I ever been. I pray to
God for Justice. This invold (3)
different Doctors at St. Vincent
Medical Center,

I can identify the Doctor I saw, putting Drugs in my I.V., I can identify the Doctor that victimised me, He have one of a kind private area, Something is wrong with his ~~right~~ eye. He also wear mask, Looks like another person, which should be against the Law, for a Doctor to wear on the Job.

I have some proof.

"Please Help Me" get justice.

The Law past, that, when a person is draged to be Raped it can go beyond 5 years.

Thank You! For reading this. Don't let St. Vincent get away with this, Don't include my Case in the Bankruptcy, give the F.B.I. a change, Because, the Surgery that was done, is ~~against~~ D.T. against the Law in U.S.A., It's a surgery they do in Mexico, you only have 15 years, to live after this surgery, Done in St. Vincent Hospital and 1234 W. Vermont in L.A.. They let people make payments on the surgery until they pay in full, I heard this in the Doctor office, from some Nurses, that was going to let them do the surgery, I'm part of the reason they went Bankruptcy

Thank You, Now Thompson

CASE SCREENING FACTOR(S)		RAPE		INVEST DIV. RAMP		INC # 15072300		DR #	
<input type="checkbox"/> SUSPECT/VEHICLE NOT SEEN <input checked="" type="checkbox"/> PRINTS OR OTHER EVIDENCE NOT PRESENT <input checked="" type="checkbox"/> MO NOT DISTINCT <input checked="" type="checkbox"/> PROPERTY LOSS LESS THAN \$5,000 <input checked="" type="checkbox"/> NO SERIOUS INJURY TO VICTIM <input checked="" type="checkbox"/> ONLY ONE VICTIM INVOLVED		VICTIM		LAST NAME, FIRST, MIDDLE (OR NAME OF BUSINESS) Doris T		SEX		DESC	
PREMISES (SPECIFIC TYPE) <input type="checkbox"/> ATM				ADDRESS		ZIP		PHONE	
RECOVERY ROOM				B -				<input type="checkbox"/> X	
				E-MAIL ADDRESS				CELL PHONE	
				DR. LIC. NO. (IF NONE, OTHER ID & NO.)		FOREIGN LANGUAGE SPOKEN		OCCUPATION	
ENTRY 459/BFV POINT OF ENTRY		POINT OF EXIT		LOCATION OF OCCURRENCE		SAME AS V'S <input type="checkbox"/> RES. <input type="checkbox"/> BUS.		R.D.	
<input type="checkbox"/> FRONT <input type="checkbox"/> REAR <input type="checkbox"/> SIDE <input type="checkbox"/> ROOF <input type="checkbox"/> FLOOR <input type="checkbox"/> OTHER		METHOD		ST Vincent Medical Cntr 2131 W 3RD ST LA		0235		PRINTS BY PREL. INV. ATTEMPT OBTAINED <input type="checkbox"/> Y <input type="checkbox"/> N	
		INSTRUMENT/TOOL USED		DATE & TIME OF OCCURRENCE		DATE & TIME REPORTED TO PD			
				10/07/2012 7:30 10/07/2012 12:30		07/23/2015 17:15			
				TYPE PROPERTY STOLEN/LOST/DAMAGED <input type="checkbox"/> 03.04.00 GIVEN		STOLEN/LOST		RECOVERED	
						\$		\$	
								EST. DAMAGED ARSON / VAND.	
								\$	
VICT'S VEH. (IF INVOLVED) YEAR, MAKE, TYPE, COLOR, LIC. NO.				NOTIFICATION(S) (PERSON & DIVISION)				CONNECTED REPORT(S) (TYPE & DR #)	
MO IF LONG FORM, LIST UNIQUE ACTIONS. IF SHORT FORM, DESCRIBE SUSPECT'S ACTIONS IN BRIEF PHRASES, INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY REPORT AS NECESSARY. IF ANY OF THE MISSING ITEMS ARE POTENTIALLY IDENTIFIABLE, ITEMIZE AND DESCRIBE ALL ITEMS MISSING IN THIS INCIDENT IN THE NARRATIVE.									
Susp entered recovery room gave vict drugs and got in bed with vict, sodomized and rape vict for the first time.									
MANDATORY MARSY'S RIGHTS CARD PROVIDED TO THE VICTIM <input checked="" type="checkbox"/>									
MOTIVATED BY HATRED/PREJUDICE <input type="checkbox"/>									
DOMESTIC VIOLENCE <input type="checkbox"/>									
REPORTING EMPLOYEE(S)		INITIALS, LAST NAME		SERIAL NO.		DIV./DETAIL		PERSON REPORTING	
		CARLISLE		26108		Ramp/Desk		SIGNATURE	
								OR RECEIVED BY PHONE <input type="checkbox"/>	
NOTE: IF SHORT FORM AND VICTIM/PR ARE NOT THE SAME, ENTER PR INFORMATION IN INVOLVED PERSONS SECTION.									

THIS REPORT DOES NOT CONSTITUTE VALID IDENTIFICATION

KEEP THIS REPORT FOR REFERENCE. INSTRUCCIONES EN ESPANOL AL REVERSO.

Your case will be assigned to a detective for follow-up investigation based upon specific facts obtained during the initial investigation. Studies have shown that the presence of these facts can predict whether a detailed follow-up investigation would likely result in the arrest and prosecution of the suspect(s) or the recovery of property, in a manner that is cost-effective to you, the taxpayer. Significant decreases in personnel have made it impossible for detectives to personally discuss each and every case with all crime victims. A detective will not routinely contact you, unless the detective requires additional information.

TO REPORT ADDITIONAL INFORMATION: If you have specific facts to provide which might assist in the investigation of your case, please contact the detective Monday through Friday, between 8:00 A.M. and 9:30 A.M., or between 2:30 P.M. and 4:00 P.M. at telephone number _____. If the detective is not available when you call, please leave a message and include the telephone number where you can be reached.

COPY OF REPORT: If you wish to purchase a copy of the complete report, phone (213) 486-8130 to obtain the purchase price. Send a check or money order payable to the Los Angeles Police Department to Records and Identification Division, Box 30158, Los Angeles, CA 90030. Include a copy of this report or the following information with your request: 1) Name and address of victims; 2) Type of report and DR number (if listed above); 3) Date and location of occurrence. NOTE: Requests not accompanied by proper payment will not be processed.

DR NUMBER: If not entered on this form, the DR number may be obtained by writing to Records and Identification Division and giving the information needed to obtain a copy of the report (see above paragraph). Specify that you only want the DR number. It will be forwarded without delay. There is no charge for this service.

CREDIT CARDS/CHECKS: Immediately notify concerned credit corporation or banks to avoid possibility of being liable for someone else using your stolen or lost credit card or check.

HOW YOU CAN HELP THE INVESTIGATION OF YOUR CASE:

- * Keep this memo for reference.
- * If stolen items have serial numbers not available at time of report, attempt to locate them and phone them to the detective at the listed number.
- * If you discover additional losses, complete and mail in the Supplemental Property Loss form given to you by the reporting employee.
- * Promptly report recovery of property.
- * Promptly report additional information such as a neighbor informing you of suspicious activity at time crime occurred.

VICTIM-WITNESS ASSISTANCE PROGRAM: The Los Angeles City and County Victim-Witness Assistance Program (VWAP) can help to determine if you qualify for Victim of Violent Crime compensation. If you qualify, they will assist with filling your claim application. If you are a victim or a witness to a crime and will be going to court, they will explain the court procedures to you. Their staff may also assist you with other problems created by the crime.

To find the program location nearest to you, call the Victim-Witness Assistance Program at the Los Angeles City Attorney's Office (213) 485-6976, or the Los Angeles County District Attorney's Office (800) 380-3811.

VICTIMS OF VIOLENT CRIME COMPENSATION: Refer to paragraph at bottom of reverse side.