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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 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. Judge Ernest M. Robles

**STIPULATION EXTENDING OBJECTION DEADLINE FOR
THE CHUBB COMPANIES RE DEBTOR'S NOTICE OF
MOTION AND MOTION FOR ORDER AUTHORIZING
DISPOSAL OF CERTAIN BUSINESS AND OTHER NON-
PATIENT RECORDS [RELATES TO DOCKET NO. 3355]**

Hearing:

Date: November 6, 2019
Time: 10:00 a.m.
Place: United States Bankruptcy Court
Courtroom 1568
255 East Temple Street
Los Angeles, California 90012



DENTONS US LLP
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LOS ANGELES, CALIFORNIA 90017-5704
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1 This stipulation is entered between the above-captioned debtors and debtors in possession
2 (the “Debtors”), on the one hand, and Federal Insurance Company, ACE American Insurance
3 Company and Illinois Union Insurance Company (collectively with each of their affiliates and
4 successors, the “Chubb Companies”), on the other, in the above-captioned jointly administered
5 cases with respect to the following:

6 1. On October 10, 2019, the Debtors filed the *Debtor’s Notice of Motion and Motion*
7 *for Order Authorizing Disposal of Certain Business and Other Non-Patient Records* [Docket No.
8 3355] (the “Non-Patient Records Motion”).

9 2. The deadline to object to the Non-Patient Records Motion is October 23, 2019 (the
10 “Objection Deadline”) and the hearing is set for November 6, 2019, at 10:00 a.m. (Pacific Time).
11 The deadline of the Debtors to reply to any objection is October 30, 2019 (the “Reply Deadline”).

12 3. Based on a request from the Chubb Companies, the Debtors have agreed to extend
13 the Chubb Companies’ Objection Deadline and the Reply Deadline to allow additional time to
14 address any of the Chubb Companies’ concerns.

15 NOW, THEREFORE, all of the parties to this Stipulation hereby stipulate as follows:

16 A. The Objection Deadline for the Chubb Companies shall be extended to November
17 1, 2019, at 4:00 p.m. (Pacific Time).

18 B. The Debtors’ Reply Deadline shall be extended to November 4, 2019, at 4:00 p.m.
19 (Pacific Time).

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1 **Verity Health System of California, Inc. *et al.***

2 DATED: October 22, 2019

DENTONS US LLP

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4 By: /s/ Tania M. Moyron

Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

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8 **Federal Insurance Company, ACE American Insurance Company
and Illinois Union Insurance Company**

9 DATED: October 22, 2019

DUANE MORRIS LLP

10
11 By: _____

Drew S. McGehrin (Admitted *Pro Hac Vice*)

Counsel to Federal Insurance Company, ACE

American Insurance Company and Illinois Union

Insurance Company

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1 **Verity Health System of California, Inc. et al.**

2 DATED: October 22, 2019

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4 By: /s/ Tania M. Moyron

5 Samuel Maizel

Tania M. Moyron

Counsel to Debtors and Debtors in Possession

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8 **Federal Insurance Company, ACE American Insurance Company
and Illinois Union Insurance Company**

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11 By: 

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