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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 CONTINUING HEARING AND EXTENDING OBJECTION  
DEADLINE FOR NANTWORKS, LLC RE ORDER (1) APPROVING FORM  
OF ASSET PURCHASE AGREEMENT FOR STALKING HORSE BIDDER  
AND FOR PROSPECTIVE OVERBIDDERS, (2) APPROVING AUCTION  
SALE FORMAT, BIDDING PROCEDURES AND STALKING HORSE BID  
PROTECTIONS [RELATES TO DOCKET NO. 1572, 2128, 2618, 2795, 2882,  
2945, 3045, 3153, 3365]**

**Continued Hearing:**

Date: November 20, 2019  
Time: 10:00 a.m.  
Place: United States Bankruptcy Court  
Courtroom 1568  
255 East Temple Street  
Los Angeles, California 90012



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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 NantWorks, LLC, (“NantWorks”), on the other, in the  
3 above-captioned jointly administered cases with respect to the following:

4 1. On February 19, 2019, the Court entered its *Order (1) Approving Form Of Asset*  
5 *Purchase Agreement For Stalking Horse Bidder And For Prospective Overbidders, (2) Approving*  
6 *Auction Sale Format, Bidding Procedures And Stalking Horse Bid Protections, (3) Approving*  
7 *Form Of Notice To Be Provided To Interested Parties, (4) Scheduling A Court Hearing To*  
8 *Consider Approval Of The Sale To The Highest Bidder, And (5) Approving Procedures Related To*  
9 *The Assumption Of Certain Executory Contracts And Unexpired Leases; And (II) An Order (A)*  
10 *Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances*  
11 [Docket No. 1572] the (“Bidding Procedures Order”), which set a deadline for counterparties to  
12 executory contracts and unexpired leases to object to the cure amounts, identified by the Debtors,  
13 on or before March 22, 2019, at 4:00 p.m. (Pacific Time) (the “Objection Deadline”).

14 2. After previous extensions [Docket Nos. 1886, 1968, 2098, 2128, 2427, 2618, 2795,  
15 2882, 2945, 3045, 3153], on October 11, 2019, the Court approved an extension of the Objection  
16 Deadline for NantWorks to October 23, 2019, at 4:00 p.m. (Pacific Time), the Debtors’ reply  
17 deadline (the “Reply Deadline”) to October 30, 2019 at 4:00 p.m. (Pacific Time), and continued  
18 the hearing date (the “Hearing Date”) to November 6, 2019, at 10:00 a.m. (Pacific Time) [Docket  
19 No. 3365].

20 3. NantWorks and the Debtors have continued in discussions regarding cure amounts  
21 and assumption and assignment related to executory contracts and unexpired leases, and the  
22 Debtors have agreed to further extend the Objection Deadline, the Reply Deadline and the Hearing  
23 Date to allow additional time to review and reconcile such amounts.

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

25 A. The Objection Deadline for NantWorks shall be extended to November 6, 2019, at  
26 4:00 p.m. (Pacific Time).

1 B. The Reply Deadline for the Debtors shall be extended to November 13, 2019, at  
2 4:00 p.m. (Pacific Time).

3 C. The Hearing Date shall be continued to November 20, 2019, at 10:00 a.m. (Pacific  
4 Time).

5  
6 **Verity Health System of California, Inc. *et al.***

7 DATED: October 23, 2019

DENTONS US LLP

8 By: /s/ Tania M. Moyron

9 Samuel Maizel

Tania M. Moyron

10 Counsel to Debtors and Debtors in Possession

11 **NantWorks, LLC**

12 DATED: October 23, 2019

JONES DAY

14 By:

15 Benjamin Rosenblum

Counsel to NantWorks, LLC

DENTONS US LLP  
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LOS ANGELES, CALIFORNIA 90017-5704  
(213) 623-9300

1 B. The Reply Deadline for the Debtors shall be extended to November 13, 2019, at  
2 4:00 p.m. (Pacific Time).

3 C. The Hearing Date shall be continued to November 20, 2019, at 10:00 a.m. (Pacific  
4 Time).

5  
6 **Verity Health System of California, Inc. et al.**

7 DATED: October 23, 2019

DENTONS US LLP

8 By: /s/ Tania M. Moyron

9 Samuel Maizel

10 Tania M. Moyron

Counsel to Debtors and Debtors in Possession

11 **NantWorks, LLC**

12 DATED: October 23, 2019

JONES DAY

13  
14 By:  /pss

15 Benjamin Rosenblum

16 Counsel to NantWorks, LLC  
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