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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

**TENTH STIPULATION CONTINUING DEADLINES  
RELATED TO ANY RESPONSE TO THE DEBTORS'  
MOTION TO APPROVE DISCLOSURE  
STATEMENT FILED BY OLD REPUBLIC  
INSURANCE COMPANY  
RELATES TO DOCKET NOS. 2995, 2998, 3003, 3077,  
3119, 3126, 3195, 3260, 3281, 3385, 3389, 3394, 3505,  
3506, 3594, 3595**

Hearing Date and Time:  
Date: November 20, 2019  
Time: 10:00 a.m. (Pacific Time)  
Place: Courtroom 1568  
255 E. Temple St.  
Los Angeles, CA 90012



1 This stipulation is entered into between Verity Health System Of California, Inc. and the  
2 above-referenced affiliated debtors and debtors in possession in the above captioned chapter 11  
3 bankruptcy cases (collectively, the “Debtors”), on the one hand, and Old Republic Insurance  
4 Company (“Old Republic” and, together with the Debtors, the “Parties”), on the other, with  
5 respect to the following:

6 A. On September 3, 2019, the Debtors filed the *Debtors’ Chapter 11 Plan of*  
7 *Liquidation (Dated September 3, 2019)* [Docket No. 2993] (the “Plan”) and related *Disclosure*  
8 *Statement Describing Debtors’ Chapter 11 Plan of Liquidation (Dated September 3, 2019)*  
9 [Docket No. 2994] (the “Disclosure Statement”).

10 B. On September 4, 2019, the Debtors filed the *Notice of Hearing and Motion of the*  
11 *Debtors for an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting*  
12 *Procedures; (III) Notice and Objection Procedures for Confirmation of Debtors’ Plan; and*  
13 *(IV) Granting Related Relief* [Docket No. 2995] (the “Motion”). The Motion requests that the  
14 Court (i) approve the Disclosure Statement, (ii) find that the Disclosure Statement contains  
15 “adequate information” pursuant to 11 U.S.C. § 1125, (iii) approve solicitation and voting  
16 procedures related to confirmation of the Plan, (iv) establish notice and objection procedures for  
17 confirmation of the Plan, and (v) grant such other relief as is necessary.

18 C. On September 4, 2019, the Court entered the *Order Setting Hearing on Motion for*  
19 *Approval of Disclosure Statement for October 2, 2019, at 10:00 a.m.* [Docket No. 2998] (the  
20 “Scheduling Order”), setting the Motion for hearing on October 2, 2019 at 10:00 a.m.. The Court  
21 also set September 18, 2019 as the deadline to file oppositions to the Motion (the “Opposition  
22 Deadline”) and September 25, 2019 as the deadline to file replies (the “Reply Deadline”) in  
23 support of the Motion. *See* Scheduling Order, ¶ 1 at 2.

24 D. On September 17, 2019, the Court entered the *Order Approving Stipulation*  
25 *Continuing Deadlines Related to Any Response to the Debtors’ Motion to Approve Disclosure*  
26 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
27 3077], which extended the Opposition Deadline to September 20, 2019 and extended the Reply  
28 Deadline to September 27, 2019.

1 E. On September 24, 2019, the Court entered the *Order Approving Second*  
2 *Stipulation Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve*  
3 *Disclosure Statement Filed by Old Republic Insurance Company and the Chubb Companies*  
4 [Docket No. 3119], which extended the Opposition Deadline to September 24, 2019 and extended  
5 the Reply Deadline to September 30, 2019, at 12:00 p.m. (Pacific Time).

6 F. On September 24, 2019, the Court entered the *Order Granting Motion to Continue*  
7 *Hearing on Motion of the Debtors for an Order Approving: (I) Proposed Disclosure Statement;*  
8 *(II) Solicitation and Voting Procedures III) Notice and Objection Procedures for Confirmation of*  
9 *Debtors' Plan; and (IV) Granting Related Relief* [Docket No. 3120], which granted the Debtors'  
10 first request to continue the hearing on the Motion to October 15, 2019, at 10:00 a.m. (Pacific  
11 Time).

12 G. On September 24, 2019, the Court entered the *Order Approving Third Stipulation*  
13 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
14 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
15 3126], which extended the Opposition Deadline to October 1, 2019 and extended the Reply  
16 Deadline to October 8, 2019.

17 H. On October 1, 2019, the Court entered the *Order Approving Fourth Stipulation*  
18 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
19 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
20 3195], which extended the Opposition Deadline to October 7, 2019 and extended the Reply  
21 Deadline to October 11, 2019.

22 I. On October 7 2019, the Court entered the *Order Granting Motion to Continue*  
23 *Hearing on Motion of the Debtors for an Order Approving: (I) Proposed Disclosure Statement;*  
24 *(II) Solicitation and Voting Procedures (III) Notice and Objection Procedures for Confirmation*  
25 *of Debtors' Plan; and (IV) Granting Related Relief in Light of the Court's Ruling on Emergency*  
26 *Motion* [Docket No. 3260], which granted the Debtors' second request to continue the hearing on  
27 the Motion to October 23, 2019, at 10:00 a.m. (Pacific Time).

28 J. On October 7, 2019, the Court entered the *Order Approving Fifth Stipulation*

1 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
2 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
3 3281], which extended the Opposition Deadline to October 11, 2019 and extended the Reply  
4 Deadline to October 16, 2019.

5 K. On October 15, 2019, the Court entered the *Order Approving Sixth Stipulation*  
6 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
7 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
8 3385], which extended the Opposition Deadline to October 16, 2019 and extended the Reply  
9 Deadline to October 21, 2019.

10 L. On October 16, 2019, the Court entered the *Order Granting Motion to Continue*  
11 *Hearing on Motion of the Debtors for an Order Approving: (I) Proposed Disclosure Statement;*  
12 *(II) Solicitation and Voting Procedures (III) Notice and Objection Procedures for Confirmation*  
13 *of Debtors' Plan; and (IV) Granting Related Relief* [Docket No. 3389], which granted the  
14 Debtors' third request to continue the hearing on the Motion to November 6, 2019, at 10:00 a.m.  
15 (Pacific Time).

16 M. On October 17, 2019, the Court entered the *Order Approving Seventh Stipulation*  
17 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
18 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
19 3394], which extended the Opposition Deadline to October 29, 2019 and extended the Reply  
20 Deadline to November 1, 2019.

21 N. On October 30, 2019, the Court entered the *Order Granting Motion to Continue*  
22 *Hearing on Motion of the Debtors for an Order Approving: (I) Proposed Disclosure Statement;*  
23 *(II) Solicitation and Voting Procedures (III) Notice and Objection Procedures for Confirmation*  
24 *of Debtors' Plan; and (IV) Granting Related Relief* [Docket No. 3506], which granted the  
25 Debtors' fourth request to continue the hearing on the Motion to November 20, 2019, at 10:00  
26 a.m. (Pacific Time).

27 O. On October 30, 2019, the Court entered the *Order Approving Eighth Stipulation*  
28 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*

1 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
2 3507], which extended the Opposition Deadline to November 11, 2019 and extended the Reply  
3 Deadline to November 13, 2019.

4 P. On November 12, 2019, the Court entered the *Order Approving Ninth Stipulation*  
5 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
6 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
7 3595], which extended the Opposition Deadline to November 14, 2019 and extended the Reply  
8 Deadline to November 17, 2019.

9 Q. The Parties continue to engage in negotiations concerning the Disclosure  
10 Statement and Plan, and jointly agree to further extend the Opposition Deadline to allow  
11 additional time to engage in negotiations.

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

14 1. The Opposition Deadline for Old Republic shall be extended from November 14,  
15 2019 to November 15, 2019.

16 2. The Reply Deadline for the Debtors shall remain November 17, 2019 with respect  
17 to any opposition or response to the Motion filed by Old Republic.

18  
19 Dated: November 14, 2019

DENTONS US LLP

20 By: /s/ Tania M. Moyron

21 Tania M. Moyron

22 Counsel to the Debtors and Debtors in Possession

23 Dated: November 14, 2019

FOX SWIBEL LEVIN & CARROLL LLP

24  
25 By: \_\_\_\_\_

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26 Counsel to Old Republic Insurance Company  
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28

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1 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
2 3507], which extended the Opposition Deadline to November 11, 2019 and extended the Reply  
3 Deadline to November 13, 2019.

4 P. On November 12, 2019, the Court entered the *Order Approving Ninth Stipulation*  
5 *Continuing Deadlines Related to Any Response to the Debtors' Motion to Approve Disclosure*  
6 *Statement Filed by Old Republic Insurance Company and the Chubb Companies* [Docket No.  
7 3595], which extended the Opposition Deadline to November 14, 2019 and extended the Reply  
8 Deadline to November 17, 2019.

9 Q. The Parties continue to engage in negotiations concerning the Disclosure  
10 Statement and Plan, and jointly agree to further extend the Opposition Deadline to allow  
11 additional time to engage in negotiations.

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

14 1. The Opposition Deadline for Old Republic shall be extended from November 14,  
15 2019 to November 15, 2019.

16 2. The Reply Deadline for the Debtors shall remain November 17, 2019 with respect  
17 to any opposition or response to the Motion filed by Old Republic.

18  
19 Dated: November 14, 2019

DENTONS US LLP

20 By: \_\_\_\_\_

21 Tania M. Moyron

22 Counsel to the Debtors and Debtors in Possession

23 Dated: November 14, 2019

FOX SWIBEL LEVIN & CARROLL LLP

24 By:  \_\_\_\_\_

25 Margaret M. Anderson

26 Counsel to Old Republic Insurance Company  
27  
28