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9 Attorneys for Defendant

10 **UNITED STATES BANKRUPTCY COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

12 In re

13 VERITY HEALTH SYSTEM OF CALIFORNIA,
 14 INC., *et al.*,

15 Debtors and Debtors In Possession.

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

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

18 Chapter 11

19 VERITY HEALTH SYSTEM OF CALIFORNIA,
 20 INC., a California nonprofit public benefit
 21 corporation, ST. VINCENT MEDICAL
 22 CENTER, a California nonprofit public benefit
 23 corporation and ST. FRANCIS MEDICAL
 24 CENTER, a California nonprofit public benefit
 25 corporation,

26 Plaintiffs,

27 v.

28 HERITAGE PROVIDER NETWORK, INC., a
 California corporation,

Defendant.

**STIPULATION EXTENDING LITIGATION
 DEADLINES AND CONTINUING PRE-
 TRIAL CONFERENCE AND TRIAL
 WEEK DATES**

[No Hearing Required]

TO THE HONORABLE ERNEST M. ROBLES, UNITED STATES BANKRUPTCY JUDGE:

The parties to the within adversary proceeding, Plaintiffs, Verity Health System of California, Inc., St. Vincent Medical Center, and St. Francis Medical Center, (collectively, "Verity" or "Plaintiffs"), and Defendant, Heritage Provider Network, Inc., ("Heritage" or "Defendant"), stipulate as follows:



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RECITALS

1. Plaintiffs' First Amended Complaint was filed in this action on March 11, 2019 [Docket No. 13] and Defendant's Answer thereto was filed on April 12, 2019 [Docket No. 22].
2. On May 31, 2019, the Court entered a Scheduling Order in this adversary proceeding [Docket No. 25]. Thereafter, so as to correct a clerical error in the Scheduling Order at to the trial week date, the Court entered its Amended Scheduling Order on July 19, 2019 [Docket No. 32]. Subsequently, Plaintiffs and Defendant stipulated to extend litigation deadlines and continue the pre-trial conference and trial week dates [Docket No. 40] (the "Current Scheduling Order").
3. Due to ongoing discovery and travel schedules, the parties have agreed to continue the existing litigation deadlines, the Pre-Trial Conference and Trial Week Dates in this adversary proceeding.
- It is therefore agreed between the Parties hereto as follows:

STIPULATION

1. The above Recitals are incorporated herein by reference.
2. It is hereby stipulated and agreed between the Parties hereto that the Current Scheduling Order be amended in the following particulars:
- (a) The last day to disclose expert witness and expert witness reports is extended from January 15, 2020 to February 14, 2020.
- (b) The last day to disclose rebuttal expert witnesses and rebuttal expert witness reports be extended from February 14, 2020, to March 13, 2020;
- (c) The last day to complete discovery relating to expert witnesses, including hearings on motions related to expert discovery, be extended from March 13, 220 to April 16, 2020;
- (d) The last day for dispositive motions to be heard be extended from February 24, 2020 to March 26, 2020;

1 (e) The last day to complete discovery (except as to experts), including
2 hearings on discovery motions be extended from March 18, 2020 to April 17, 2020;

3 (f) The Pre-Trial Conference presently set for April 14, 2020 at 11:00 a.m.
4 be continued to May 12, 2020 at 11:00 a.m.; and

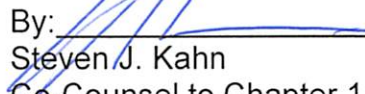
5 (g) Trial, currently set for the week of April 27, 2020 be continued to the
6 week of May 25, 2020 or the next available trial week of the Court.

7 3. All other terms and deadlines set forth in the Current Scheduling Order are to
8 remain in full force and effect.

9 4. This Stipulation is without prejudice to any Party to seek further deadline, Pre-
10 Trial or Trial Week extensions for good cause shown.

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13 PACHULSKI STANG ZIEHL & JONES LLP

14 Dated: November 19, 2019

15 By: 
16 Steven J. Kahn
17 Co-Counsel to Chapter 11 Debtors and
18 Debtors in Possession and Counsel for Plaintiffs

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20
21 Dated: November __, 2019

22 LESLIE COHEN LAW, PC

23 By: /s/ Leslie A. Cohen
24 Leslie A. Cohen.
25 Attorneys for Defendant
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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:
506 Santa Monica Blvd., Suite 200, Santa Monica, CA 90401

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING LITIGATION DEADLINES AND CONTINUING PRE-TRIAL CONFERENCE AND TRIAL WEEK DATES** 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*) 11/19/19, 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; olivia@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*) 11/19/19, 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.

Hon. Ernest Robles
U.S. Bankruptcy Court
255 E. Temple Street
Los Angeles, CA 90012

Office of the U.S. Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, CA 90017

☐ Service information continued on attached pages

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*) _____, 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.

☐ 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.

11/19/19

Olivia Hill

/s/ Olivia Hill

Date

Printed Name

Signature