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**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.

Lead Case No. 2:18-bk-20151-ER  
  
Adversary No. 2:19-ap-01042-ER  
  
Chapter 11

VERITY HEALTH SYSTEM OF CALIFORNIA,  
INC., a California nonprofit public benefit  
corporation, ST. VINCENT MEDICAL CENTER,  
a California nonprofit public benefit corporation  
and ST. FRANCIS MEDICAL CENTER, a  
California nonprofit public benefit corporation,

Plaintiffs,

v.

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:

**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, due to ongoing discovery and travel schedules, Plaintiffs and Defendant entered into two stipulations to extend litigation deadlines and continue the pre-trial conference and trial week dates [Docket Nos. 39 and 45] resulting in the (“Current Scheduling Order”) [Docket No. 47].

3. Thereafter, in responding to Requests for Production of Documents, and by reason of the unanticipated large number of documents requiring review, counsel for both Plaintiffs and Defendant have ascertained that the time required to assemble requested documents and review same for responsiveness, privilege and redaction prior to production is taking more time than initially anticipated, thereby causing delay in conducting depositions and further discovery.

4. Therefore, the parties have agreed to continue the existing litigation deadlines, the Pre-Trial Conference and Trial Week Dates in this adversary proceeding, and to call for the completion of fact discovery prior to the close of expert discovery so that the experts will have the benefit of all disclosed facts.

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 complete discovery (except as to experts), including hearings on discovery motions be extended from April 17, 2020 to June 20, 2020;

(b) The last day to disclose expert witness and expert witness reports is extended from February 14, 2020 to June 25, 2020;

(c) The last day to disclose rebuttal expert witnesses and rebuttal expert witness reports be extended from March 13, 2020 to July 24, 2020;

(d) The last day to complete discovery relating to expert witnesses, including hearings on motions related to expert discovery, be extended from April 16, 2020 to August 25, 2020;

(e) The last day for dispositive motions to be heard be extended from March 26, 2020 to August 7, 2020;

(f) The Pre-Trial Conference presently set for May 12, 2020 at 11:00 a.m. be continued to September 2, 2020 at 11:00 a.m.; and

(g) Trial, currently set for the week of May 25, 2020 be continued to the week of September 14, 2020 or the next available trial week of the Court.

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

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


PACHULSKI STANG ZIEHL & JONES LLP

Dated: January 8, 2020

By: /s/ Steven J. Kahn  
Steven J. Kahn  
Co-Counsel to Chapter 11 Debtors and  
Debtors in Possession and Counsel for Plaintiffs

Dated: January 8, 2020

LESLIE COHEN LAW, PC

By:   
Leslie A. Cohen.  
Attorneys for Defendant

## 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:  
**10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067**

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*) **January 8, 2020**, 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)** ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, 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.

☐ Service information continued on attached page

**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*) **January 8, 2020**, 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.

**VIA HAND DELIVERY**

Honorable Ernest M. Robles  
U.S. Bankruptcy Court  
255 E. Temple Street, Suite 1560 / Courtroom 1568  
Los Angeles, CA 90012

☒ 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.

January 8, 2020  
\_\_\_\_\_  
*Date*

Mary de Leon  
\_\_\_\_\_  
*Printed Name*

/s/ Mary de Leon  
\_\_\_\_\_  
*Signature*

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.