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

[additional counsel on next page]

**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.

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS of VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,

Plaintiff,

v.

UMB BANK, NATIONAL ASSOCIATION, as
trustee,

Defendant.

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

Chapter 11

Hon. Ernest M. Robles

Adv. Proc. No. 2:19-ap-01166-ER

JOINT STATUS REPORT

Status Conference:

Date: February 19, 2020

Time: 10:00 AM

Location: Telephonic



182015120021200000000002

1 MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C.

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11 *Attorneys for Defendant*

UMB Bank, N.A. as master indenture trustee

1 Pursuant to the Court's Order of January 7, 2020 [Docket No. 53], the Official Committee of
2 Unsecured Creditors (the "Committee") and UMB Bank, National Association ("UMB Bank," and
3 together with the Committee, the "Parties") hereby submit this Joint Status Report.

4 The Committee filed its initial Complaint for Determination of Validity, Priority, and Extent
5 of Liens and Security Interests in this action on June 13, 2019 [Docket No. 1]. The Committee filed
6 its First Amended Complaint on September 11, 2019 [Docket No. 28], and UMB Bank filed a Motion
7 to Dismiss the First Amended Complaint on September 30, 2019 [Docket No. 37] (the "Motion to
8 Dismiss"). The Committee filed an opposition to the Motion to Dismiss on October 17, 2019 [Docket
9 No. 42]. UMB Bank filed a reply to the Committee's opposition on October 24, 2019 [Docket No.
10 44].

11 The Committee filed the *Official Committee of Unsecured Creditors' Omnibus Objection to*
12 *Claims Filed by U.S. Bank National Association, UMB Bank, N.A., and Wells Fargo Bank, National*
13 *Association, as Trustees; Declaration of Mark Shinderman in Support Thereof* [Bankr. Docket No.
14 3634] in the Debtors' bankruptcy cases on November 18, 2019 (the "Claims Objection"). The Claims
15 Objection incorporates by reference the Committee's adversary actions asserted in this adversary
16 proceeding.

17 The Court continued the hearing on the Motion to Dismiss, originally scheduled for
18 November 19, 2019, to December 19, 2019 [Docket No. 45], and then to January 8, 2020 [Docket No.
19 50]. On January 6, 2020, the Parties filed the *Stipulation Regarding Hearing on Motion of UMB Bank,*
20 *N.A., as Master Trustee, to Dismiss Amended Complaint* [Docket No. 52] (the "Stipulation"). Under
21 the Stipulation, the Parties agreed that "[t]he hearing on the Motion to Dismiss shall be held in
22 abeyance pending request of any party to the Adversary Proceeding and/or further order of the Court."
23 [Docket No. 52 at 2.] On January 7, 2020, the Court issued an Order approving the Stipulation and
24 setting a telephonic status conference for February 19, 2020 at 10:00 a.m. Pacific Time [Docket No.
25 53]. Given that the Debtors are still working to implement sales of their remaining assets, the Parties
26 do not request a hearing at this time.

1
2 DATED: February 12, 2020

Respectfully submitted,

MILBANK LLP



Mark Shinderman

Robert J. Liubicic

Daniel B. Denny

Alexandra Achamallah

*Counsel for the Official Committee of
Unsecured Creditors of Verity Health System of
California, Inc., et al.*

8
9 DATED: February 12, 2020

MINTZ LEVIN COHN FERRIS GLOVSKY AND
POPEO, P.C.



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Attorneys for Defendant

UMB Bank, N.A. as master indenture trustee

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:

2029 Century Park E, 33rd Floor, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled (*specify*): **JOINT STATUS REPORT** 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*) February 12, 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:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) February 12, 2020, 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*) February 12, 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.

☒ 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.

February 12, 2020
Date

Beth Aalberts
Printed Name

/s/ Beth Aalberts
Signature

SERVICE LIST

(Via NEF)

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The Honorable Ernest M. Robles

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