

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>GARY E. KLAUSNER (SBN 69055) LEVENE, NEALE, BENDER, YOO & BRILL L.L.P. 10250 Constellation Blvd., Suite 1700 Los Angeles, CA 90067 T: (310) 229-1234; F: (310) 229-1244 Email: gek@lnbyb.com</p> <p>KEVIN D. RISING (SBN 211663) BARNES & THORNBURG LLP 2029 Century Park East, Suite 300 Los Angeles, CA 90067-2904 T: (310) 284-3888 Email: kevin.rising@btlaw.com</p> <p><input checked="" type="checkbox"/> <i>Attorney for:</i> Strategic Global Management, Inc.</p>	<p>FOR COURT USE ONLY</p>
<p align="center">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re:</p> <p>Verity Health System of California, Inc., et al.,</p> <p align="right">Debtor(s).</p>	<p>CASE NO.: 2:18-bk-20151-ER</p> <p>ADVERSARY NO.: 2:20-ap-01001-ER <i>(if applicable)</i></p> <p>CHAPTER: 11</p>
<p>Verity Health System of California, Inc., et al.,</p> <p align="right">Plaintiff(s) <i>(if applicable)</i>.</p> <p align="center">vs.</p> <p>Strategic Global Management, Inc., et al.,</p> <p align="right">Defendant(s) <i>(if applicable)</i>.</p>	<p align="center">NOTICE OF APPEAL AND STATEMENT OF ELECTION</p>

Part 1: Identify the appellant(s)

1. Name(s) of appellant(s): Strategic Global Management, Inc.

2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in an adversary proceeding.

☐ Plaintiff

☒ Defendant

☐ Other *(describe)*:

For appeals in a bankruptcy case and not in an adversary proceeding.

☐ Debtor

☐ Creditor

☐ Trustee

Other *(describe)*:



Part 2: Identify the subject of this appeal

1. Describe the judgment, order, or decree appealed from:
ORDER DENYING STRATEGIC GLOBAL MANAGEMENT, INC.'S EMERGENCY MOTION TO STAY
ADVERSARY PROCEEDING [Adv. Doc. No. 35]. See Exhibit A attached hereto.
2. The date the judgment, order, or decree was entered: 02/14/2020

Part 3: Identify the other parties to the appeal

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (*attach additional pages if necessary*):

1. Party: Verity Health System of California, Inc., et al.,
Attorney:
Samuel R. Maizel; Tania M. Moyron; and Nicholas A. Kiffroth
Dentons US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, CA 90017
Tel: 213-623-9300
2. Party: Official Committee of Unsecured Creditors
Attorney:
Gregory A. Bray, Mark Shinderman, James C. Behrens
Milbank LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Tel: (424) 386-4000

Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

- ☒ Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

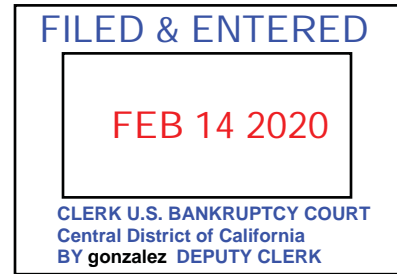
Part 5: Sign below

/s/ Gary E. Klausner Date: 02/28/2020
Signature of attorney for appellant(s) (or appellant(s)
if not represented by an attorney)

Fee waiver notice: If appellant is a child support creditor or its representative and appellant has filed the form specified in § 304(g) of the Bankruptcy Reform Act of 1994, no fee is required.

[Note to inmate filers: If you are an inmate filer in an institution and you seek the timing benefit of Fed. R. Bankr. P. 8002(c)(1), complete Director's Form 4170 (Declaration of Inmate Filing) and file that declaration along with the Notice of Appeal.]

EXHIBIT A



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 Medical 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.

Verity Health System of California, Inc., *et al.*,
Plaintiffs,
v.
Strategic Global Management, Inc., *et al.*,
Defendants

Lead Case No.: 2:18-bk-20151-ER
Adv. Case. No.: 2:20-ap-01001-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.

**ORDER DENYING STRATEGIC GLOBAL
MANAGEMENT, INC.'S EMERGENCY MOTION
TO STAY ADVERSARY PROCEEDING**

[RELATES TO ADV. DOC. NO. 19]

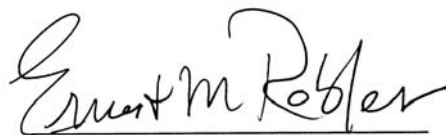
Date: February 11, 2020
Time: 10:00 a.m.
Location: Ctrm. 1568
Roybal Federal Building
255 East Temple Street
Los Angeles, CA 90012

The Court conducted a hearing on *Strategic Global Management, Inc.’s Emergency Motion to Stay Adversary Proceeding* (the “Motion”) [Adv. Doc. No. 19] at the above-captioned date and time. For the reasons set forth in the amended tentative ruling [Adv. Doc. No. 29], which the Court adopts as its final ruling and which is incorporated herein by reference, **IT IS HEREBY ORDERED** that the Motion is **DENIED**.

IT IS SO ORDERED.

###

Date: February 14, 2020

A handwritten signature in black ink, reading "Ernest M. Robles". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Ernest M. Robles
United States Bankruptcy Judge

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 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled **NOTICE OF APPEAL AND STATEMENT OF ELECTION** 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 **February 28, 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:

- James Cornell Behrens jbehrens@milbank.com, gbray@milbank.com; mshinderman@milbank.com; dodonnell@milbank.com; jbrewster@milbank.com; JWeber@milbank.com
- Gary E Klausner gek@lnbyb.com
- Jeffrey S Kwong jsk@lnbyb.com, jsk@ecf.inforuptcy.com
- Samuel R Maizel samuel.maizel@dentons.com, alicia.aguilar@dentons.com; docket.general.lit.LOS@dentons.com; tania.moyron@dentons.com; kathryn.howard@dentons.com; joan.mack@dentons.com; derry.kalve@dentons.com
- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com; nick.koffroth@dentons.com; Sonia.martin@dentons.com; lsabella.hsu@dentons.com; lee.whidden@dentons.com; Jacqueline.whipple@dentons.com
- Kyrsten Skogstad kskogstad@calnurses.org, rcraven@calnurses.org
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On **February 28, 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 **February 28, 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.

Served via Attorney Service

The Honorable Ernest M. Robles
United States Bankruptcy Court
Edward R. Roybal Federal Building
255 E. Temple Street, Suite 1560
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 28, 2020

Lisa Masse

/s/ Lisa Masse

Date

Type Name

Signature