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Debtors and Debtors In Possession

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION - LOS ANGELES**

In re

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

Debtors and Debtors in
Possession.

Case No. 2:19-cv-10352-DSF¹

On Appeal from the United States
Bankruptcy Court for the Central District
of California (Bankr. Lead Case No.:
2:18-bk-20151-ER)

Hon. Dale S. Fischer

STRATEGIC GLOBAL MANAGEMENT,
INC.,

Appellant,

v.

STATE OF CALIFORNIA; VERITY
HEALTH SYSTEM OF CALIFORNIA,
INC., *et al.*

Appellees.

**STIPULATION TO EXTEND TIME
FOR THE FILING OF RESPONSIVE
AND REPLY BRIEFS**

¹ This appeal (2:19-cv-10352-DSF) has been consolidated with the following related appeals: 2:19-cv-10354-DSF and 2:19-cv-10356-DSF.



STIPULATION

Appellees Verity Health System of California, Inc., a California nonprofit public benefit corporation, St. Vincent Medical Center, a California nonprofit public benefit corporation, St. Vincent Dialysis Center, Inc., a California nonprofit public benefit corporation, and St. Francis Medical Center, a California nonprofit public benefit corporation, Seton Medical Center, a California nonprofit public benefit corporation, and Verity Holdings, LLC, a California limited liability company (collectively, “Verity”), Appellant Strategic Global Management, Inc. (“SGM”), the Official Committee of Unsecured Creditors in Verity’s bankruptcy cases (the “Committee”), and the California Attorney General (the “AG,” and collectively, the “Parties”) hereby enter into this stipulation (the “Stipulation”) based on the following recitals of fact:

RECITALS

A. The Bankruptcy Court for the Central District of California entered three orders dated: (1) November 14, 2019 [Bankr. Doc. No. 3611] (the “November 14 Order”); (2) November 18, 2019 [Bankr. Doc. No. 3633] (the “November 18 Order”); and (3) November 27, 2019 [Bankr. Doc. No. 3724] (the “November 27 Order,” and together with the November 14 and 18 Orders, the “Orders”).

B. SGM appealed the November 14 Order (2:19-cv-10352-DSF), the November 18 Order (2:19-cv-10354-DSF), and the November 27 Order (2:19-cv-10356-DSF) by filing notices of appeal (collectively, the “Appeals”). The Appeals are now pending before the United States District Court for the Central District of California.

C. SGM filed and served its opening brief in the Appeals on February 14, 2020.

D. On March 11, 2020, March 18, 2020, and March 27, 2020, the Parties filed stipulations to extend the time to file responsive and reply briefs [Doc. Nos. 47, 49 & 51]. The Court entered orders approving those stipulations [Doc. Nos. 48, 50 & 52].

1 E. Pursuant to the *Order Approving Stipulation To Extend Time For The*
2 *Filing Of Responsive And Reply Briefs* [Doc. No. 52], the current deadline for: (1) the
3 Appellees to file their joint responsive brief (the “Responsive Brief”) is April 6, 2020;
4 and (2) SGM to file its reply brief (the “Reply Brief”) is May 4, 2020.

5 F. The AG has requested an additional one-week extension on the deadline to
6 file the joint Responsive Brief given various sale motions filed in the Bankruptcy Court.

7 G. The Committee and AG have communicated to SGM’s counsel that the
8 appellees require additional time to file the joint Responsive Brief.

9 H. The Parties have agreed to: (1) extend the deadline for the Appellees to file
10 their joint Responsive Brief to April 13, 2020; and (2) extend the deadline for SGM to
11 file its Reply Brief to May 11, 2020.

12 I. The Parties have agreed that this shall be the last extension of time for
13 Appellees to file their joint Responsive Brief.

14 **AGREEMENT**

15 **NOW, THEREFORE**, the parties to this Stipulation hereby agree and stipulate
16 as follows:

17 1. The deadline for Appellees to file their joint Responsive Brief in the
18 Appeals shall be extended from April 6, 2020 to April 13, 2020, and the deadline for
19 SGM to file its Reply Brief shall be extended from May 4, 2020 to May 11, 2020.

20 2. No further briefing extensions for Appellees’ Responsive Brief will be
21 requested.

22 **IT IS SO STIPULATED.**

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1 Dated: April 2, 2020

DENTONS US LLP
SAMUEL R. MAIZEL
SONIA R. MARTIN
TANIA M. MOYRON
NICHOLAS A. KOFFROTH

5 By: /s/Tania Moyron
Tania M. Moyron

6 Counsel for Verity Health Systems of
7 California, Inc., *et al.*

8
9 Dated: April 2, 2020

**LEVENE, NEALE, BENDER, YOO &
BRILL L.L.P.**
GARY E. KLAUSNER
JEFFREY S. KWONG

12 By: /s/ Gary E. Klausner
Gary E. Klausner

14 Counsel for Strategic Global Management,
15 Inc.

16 Dated: April 2, 2020

**CALIFORNIA DEPARTMENT OF
JUSTICE**
DAVID K. ELDAN

19 By: /s/David K. Eldan
David K. Eldan

21 Counsel for Xavier Becerra, Attorney
22 General of the State of California

23 Dated: April 2, 2020

MILBANK LLP
MARK SHINDERMAN
JAMES C. BEHRENS

25 By: /s/Mark Shinderman
Mark Shinderman

27 Counsel for the Official Committee of
28 Unsecured Creditors

CERTIFICATE OF SERVICE

1
2 1. I hereby certify that on April 2, 2020, I electronically filed the foregoing
3 document with the Clerk of the Court for the United States District Court for the
4 Central District of California using the CM/ECF system.

5 2. I further certify that parties of record to this appeal who either are
6 registered CM/ECF users, or who have registered for electronic notice, or who have
7 consented in writing to electronic service, will be served through the CM/ECF system.
8

9
10 Dated: April 2, 2020

Respectfully submitted,

DENTONS US LLP
SAMUEL R. MAIZEL
SONIA R. MARTIN
TANIA M. MOYRON

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14 By: /s/Tania M. Moyron
15 Counsel to Plaintiffs and Chapter 11
16 Debtors and Debtors In Possession
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WESTERN DIVISION - LOS ANGELES**

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STRATEGIC GLOBAL MANAGEMENT,
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Appellant,

v.

STATE OF CALIFORNIA; VERITY
HEALTH SYSTEM OF CALIFORNIA,
INC., *et al.*

Appellees.

**[PROPOSED] ORDER APPROVING
STIPULATION TO EXTEND TIME
FOR THE FILING OF RESPONSIVE
AND REPLY BRIEFS**

1 The Court having considered the “*Stipulation To Extend Time For The Filing Of*
2 *Responsive And Reply Briefs*”¹ entered into by and between Appellees Verity Health
3 System, Inc., *et al.* (“Verity”), Appellant Strategic Global Management, Inc. (“SGM”),
4 the Official Committee of Unsecured Creditors in Verity’s bankruptcy cases (the
5 “Committee”), and the California Attorney General (the “AG,” and collectively, the
6 “Parties”), and good cause appearing,

7 **HEREBY ORDERS AS FOLLOWS:**

8 A. The deadline for the Appellees to file their joint Responsive Brief in the
9 Appeals shall be extended from April 6, 2020 to April 13, 2020, and the deadline for
10 SGM to file its Reply Brief shall be extended from May 4, 2020 to May 11, 2020.

11 B. This shall be the last extension of time for Appellees to file their joint
12 Responsive Brief.

13
14 IT IS SO ORDERED.

15
16 Dated: April __, 2020

17 _____
18 Hon. Dale S. Fischer
19 UNITED STATES DISTRICT JUDGE
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28 ¹ All Capitalized but undefined terms herein shall have the same meanings ascribed to them in the Stipulation.