

1 William B. Freeman (SBN 137276)
bill.freeman@katten.com
2 Katherine M. Motsinger (SBN 322404)
katherine.motsinger@katten.com
3 KATTEN MUCHIN ROSENMAN LLP
515 South Flower Street, Suite 1000
4 Los Angeles, CA 90071
Telephone: 213.443.9000
5 Facsimile: 213.443.9001
6 Attorneys for Health Net of California, Inc.

7 **UNITED STATES BANKRUPTCY COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

9 In re:

10 VERITY HEALTH SYSTEM OF
11 CALIFORNIA, INC., et al.,

12 Debtors and Debtors in
13 Possession.

- 14 ☒ Affects All Debtors
15 ☐ Affects Verity Health System of
16 California, Inc.
17 ☐ Affects O'Connor Hospital
18 ☐ Affects Saint Louise Regional Hospital
19 ☐ Affects St. Francis Medical Center
20 ☐ Affects St. Vincent Medical Center
21 ☐ Affects Seton Medical Center
22 ☐ Affects O'Connor Hospital Foundation
23 ☐ Affects Saint Louise Regional Hospital
24 Foundation
25 ☐ Affects St. Francis Medical Center of
26 Lynwood Foundation
27 ☐ Affects St. Vincent Foundation
28 ☐ 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

Case No. 2:18-bk-20151-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

**OBJECTION OF HEALTH NET OF
CALIFORNIA, INC. TO DESIGNATED
"CURE AMOUNT" IN DEBTORS' NOTICE
TO COUNTERPARTIES TO EXECUTORY
CONTRACTS AND UNEXPIRED LEASES
OF THE DEBTORS THAT MAY BE
ASSUMED AND ASSIGNED**

Chapter 11

Hon. Ernest Robles

[RELATES TO DOCKET NO. 4267]

HEARING:

Date: April 9, 2020

Time: 10:00 AM

Place: Courtroom 1568

255 E. Temple St.

Los Angeles, CA 90012



1 Health Net of California, Inc. (“Health Net”), hereby submits this objection to the
2 “Proposed Cure Amount” set forth in Debtors’ “Notice to Counterparties to Executory Contracts
3 and Unexpired Leases of the Debtors that May Be Assumed and Assigned” (ECF No. 4267) (the
4 “Cure Notice”). All capitalized terms not otherwise defined in this Objection have the meanings
5 given for said terms in the Motion.
6

7 **I. BACKGROUND**

8 On August 31, 2018, the Debtors filed for protection in the United States Bankruptcy
9 Court for the Central District of California under chapter 11 of Title 11 of the United States Code,
10 11 U.S.C. §§ 101, et seq. (the “Petition Date”). The Debtors’ case is being jointly administered
11 under lead case number 18-20151-ER in the United States Bankruptcy Court for the Central
12 District of California, Los Angeles Division.
13

14 Health Net filed multiple, individual, proofs of claim against several of the debtors
15 involved in this action, including Debtor St. Francis Medical Center (“St. Francis”). Pursuant to
16 the “Order Establishing Bar Date for Filing Proofs of Claim” (ECF No. 1528), on March 27, 2019,
17 Health Net timely filed a proof of claim with KCC against St. Francis in the amount of
18 \$110,661.89 (Claim No. 4142).¹ That amount remains outstanding.
19

20 Health Net also filed individual administrative claims against several of the debtors
21 involved in this action, including St. Francis. Pursuant to the “Order Fixing Bar Date for Filing
22 Certain Postpetition Administrative Expense Claims and Approving the Form and Manner of
23 Notice of the Administrative Expense Claims Bar Date” (ECF No. 2961), on October 7, 2019,
24 Health Net timely filed an administrative claim against St. Francis in the amount of \$13,825.69
25 (ECF No. 3290). That amount likewise remains outstanding.
26

27
28 ¹ Health Net requests that the Court take judicial notice of all Health Net proofs of claim filed in these cases.

1 On February 26, 2020, the Court entered the “Order (1) Approving Auction Sale Format
2 and Bidding Procedures, (2) Approving Process for Discretionary Selection of Stalking Horse
3 Bidder and Bid Protections; (3) Approving Form of Notice to Be Provided to Interested Parties;
4 (4) Scheduling a Court Hearing to Consider Approval of the Sale to the Highest and Best Bidder;
5 and (5) Approving Procedures Related to the Assumption of Certain Executory Contracts and
6 Unexpired Leases” (“Bidding Procedures Order”) (ECF No. 4165). Debtors subsequently filed
7 the Cure Notice on March 13, 2020. Pursuant to the Bidding Procedures Order and the Cure
8 Notice, the last day to file an objection to the Cure Amount identified in the Cure Notice is April
9 3, 2020 at 5:00 PM.

11 **II. OBJECTION TO STATED “CURE AMOUNT” OF THE HEALTH NET**
12 **CONTRACTS.**

14 Health Net operates and maintains a network of participating medical providers throughout
15 California. Pursuant to the Bidding Procedures Order and the Cure Notice lodged by Debtors,
16 Health Net is required to identify and object to any “cure amount” set forth on Exhibit “A” to the
17 Cure Notice. Exhibit “A” states that Debtor St. Francis Medical Center is party to four
18 agreements—two provider participation agreements and two hospital service agreements—with
19 Health Net with one lump sum due: \$57,441.64 (the “Proposed Cure Amount”).

21 Upon examination of its books and records, Health Net has determined that the Proposed
22 Cure Amount is inaccurate. The actual amount owed, and which must be cured by St. Francis
23 Medical Center pursuant to 11 U.S.C. § 365(b) as a condition of assumption and assignment, is at
24 least \$127,934. This number comprises the amounts due and owing pursuant to Health Net’s
25 Proof of Claim in the amount of \$110,661.89 (Claim No. 4142), Health Net’s Administrative
26 Claim in the amount of \$13,825.69 (ECF No. 3290), and \$3,646.42, representing the amounts
27 owed that have continued to accrue since Health Net filed its Administrative Claim (collectively,
28

Katten
KattenMuchinRosenman LLP
100 Spectrum Center Drive, Suite 1050
Irvine, CA 92618-4960
714.966.6819 tel 714.966.6821 fax

1 the “Actual Cure Amount”). The Actual Cure Amount derives from the amounts Health Net has
2 paid St. Francis in excess of what was owed on claims for services. Both prior to and following
3 the Petition Date, Health Net has provided valuable services to St. Francis that have allowed St.
4 Francis to preserve the bankruptcy estate. Thus, in accordance with Health Net’s rights under
5 Bankruptcy Code Section 365, any order assuming and/or assigning any of the Health Net
6 Contracts must be conditioned upon payment of the above Actual Cure Amount on or before the
7 closing of the asset sale.²

9 The Actual Cure Amount is evidenced by the provider agreements and hospital services
10 agreements by and between Health Net and St. Francis, which are in St. Francis’s possession.
11 Attached to this Objection are Exhibits “A,” “B,” and “C,” which provide the basis for the Proof
12 of Claim, Administrative Claim, and the amounts accrued since the Administrative Claim was
13 filed, respectively. Copies of documents and agreements, including invoices, evidencing Health
14 Net’s claims are within Health Net’s possession and will be available upon written request of any
15 party-in-interest, including payment of copy charges, to:

17 KATTEN MUCHIN ROSENMAN LLP
18 ATTN: William B. Freeman
19 515 S. Flower St.
20 Suite 4150
Los Angeles, CA 90071-2212
21 213-443-9000

22 **III. HEALTH NET CONTINUES TO RESERVE ITS RIGHTS UNDER
23 BANKRUPTCY CODE SECTION 365.**

24 For the reasons set forth above, Health Net respectfully objects to the Proposed Cure
25 Amount and submits that any assumption and/or assignment of the Health Net Contracts be
26 conditioned upon payment of the Actual Cure Amount set forth herein.

28 ² Health Net remains open to settlement negotiations with St. Francis to resolve this dispute.

1 Separate and distinct from the cure amount, as the proposed assignee is yet unknown,
2 Health Net continues to reserve its right under Bankruptcy Code Section 365 to object to the
3 proposed assignee's ability to provide adequate assurance of future performance.
4

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6 DATED: April 3, 2020

Respectfully submitted,

7 KATTEN MUCHIN ROSENMAN LLP

8
9 By: /s/William B. Freeman

10 William B. Freeman

11 Attorneys for Health Net of California, Inc.
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EXHIBIT A

PRODUCT	STATE	PAYEE ID	PRV NAME	ADJ CLAIM ID	ADJ PROCESS DATE	SRV FROM DATE	SRV THRU DATE	OUTSTANDING AMOUNT	REFUND	WRITE OFF	CURRENT OUTSTANDING	ORG CLAM ID	ORG PROCESS DATE	ADJCODE	RMC	HN PLAN	CONT IND
CSP	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018341NZ3008	12/7/2018	12/6/2016	12/6/2016	\$ (5,350.58)	\$ -	\$ -	\$ (5,350.58)	2017093YXZ035	4/3/2017	C1	ML	CA	Y
CSP	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019023B44007	1/23/2019	3/30/2017	3/30/2017	\$ (564.65)	\$ -	\$ -	\$ (564.65)	2017110SUT035	4/21/2017	DQ	ML	CA	Y
CSP	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019023B44008	1/23/2019	4/6/2017	4/6/2017	\$ (700.79)	\$ -	\$ -	\$ (700.79)	2017110SUT032	4/21/2017	DQ	ML	CA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018221AFJ010	8/9/2018	6/5/2018	6/5/2018	\$ (203.80)	\$ -	\$ -	\$ (203.80)	2018181YY7924	7/2/2018	BU	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018221AHY005	8/9/2018	5/23/2018	5/23/2018	\$ (229.36)	\$ -	\$ -	\$ (229.36)	2018167XX9823	6/18/2018	F3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018222TS1028	8/10/2018	6/4/2018	6/5/2018	\$ (136.19)	\$ -	\$ -	\$ (136.19)	2018184014699	7/9/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018225AFJ008	8/13/2018	12/30/2017	12/30/2017	\$ (88.86)	\$ -	\$ -	\$ (88.86)	2018027000284	1/29/2018	BU	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018228N5P009	8/16/2018	6/9/2018	6/9/2018	\$ (73.18)	\$ -	\$ -	\$ (73.18)	2018188007498	7/9/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018229B3M001	8/17/2018	6/11/2018	6/11/2018	\$ (151.68)	\$ -	\$ -	\$ (151.68)	2018188YY6480	7/9/2018	BU	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018229B3M002	8/17/2018	6/6/2018	6/7/2018	\$ (184.99)	\$ -	\$ -	\$ (184.99)	2018181015693	7/2/2018	BU	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018232TS1004	8/20/2018	9/15/2017	9/15/2017	\$ (75.10)	\$ -	\$ -	\$ (75.10)	2017360YXH031	12/26/2017	D7	QE	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018233AFJ015	8/21/2018	3/16/2018	3/16/2018	\$ (100.89)	\$ -	\$ -	\$ (100.89)	20181369CD001	5/16/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018233NJM005	8/21/2018	5/31/2018	5/31/2018	\$ (26.72)	\$ -	\$ -	\$ (26.72)	2018174026048	6/25/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018234B3M005	8/22/2018	6/4/2018	6/4/2018	\$ (54.22)	\$ -	\$ -	\$ (54.22)	2018181XX6755	7/2/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018236TS1014	8/24/2018	5/30/2018	5/30/2018	\$ (45.86)	\$ -	\$ -	\$ (45.86)	2018174XX7411	6/25/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018236TS1025	8/24/2018	4/22/2018	4/22/2018	\$ (122.89)	\$ -	\$ -	\$ (122.89)	2018139XX8618	5/22/2018	F1	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018239AYD011	8/27/2018	6/21/2018	6/21/2018	\$ (26.77)	\$ -	\$ -	\$ (26.77)	2018220EJ5021	8/8/2018	F3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018239AYD012	8/27/2018	6/20/2018	6/20/2018	\$ (82.96)	\$ -	\$ -	\$ (82.96)	2018227N68024	8/15/2018	F3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018261JPQ014	9/18/2018	7/6/2018	7/6/2018	\$ (26.53)	\$ -	\$ -	\$ (26.53)	2018209XX9642	7/30/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018262N5P009	9/19/2018	3/21/2018	3/21/2018	\$ (56.70)	\$ -	\$ -	\$ (56.70)	2018109JTU029	4/19/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018262S4D007	9/19/2018	2/8/2018	2/9/2018	\$ (139.31)	\$ -	\$ -	\$ (139.31)	2018072U8Z021	3/13/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018267AHY005	9/24/2018	6/27/2018	6/27/2018	\$ (203.45)	\$ -	\$ -	\$ (203.45)	2018222N68017	8/10/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018272UCX005	9/29/2018	7/1/2018	7/1/2018	\$ (121.53)	\$ -	\$ -	\$ (121.53)	2018209AA5140	7/30/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018276N5P012	10/3/2018	9/27/2017	9/28/2017	\$ (47.65)	\$ -	\$ -	\$ (47.65)	2017362TJM030	12/28/2017	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018285B3M002	10/12/2018	5/18/2018	5/18/2018	\$ (49.53)	\$ -	\$ -	\$ (49.53)	2018178UDE008	6/27/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018285B3M009	10/12/2018	1/9/2018	1/9/2018	\$ (22.79)	\$ -	\$ -	\$ (22.79)	2018064XER017	3/5/2018	F3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018302ZKV010	10/29/2018	5/6/2018	5/6/2018	\$ (1,859.00)	\$ -	\$ -	\$ (1,859.00)	2018145SUW021	5/29/2018	F0	9B	CA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018311AFJ003	11/7/2018	7/6/2018	7/6/2018	\$ (82.96)	\$ -	\$ -	\$ (82.96)	2018209013824	7/30/2018	BU	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018316UCR006	11/12/2018	5/11/2018	5/11/2018	\$ (29.09)	\$ -	\$ -	\$ (29.09)	2018160XX5819	6/11/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018335C53009	12/1/2018	9/1/2017	9/30/2017	\$ (10,974.15)	\$ -	\$ -	\$ (10,974.15)	2018172YV1014	7/2/2018	C1	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018337CP4006	12/3/2018	5/23/2018	5/23/2018	\$ (1,959.00)	\$ -	\$ -	\$ (1,959.00)	2018156RZE031	6/5/2018	E3	9X	CA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018351CP4002	12/17/2018	5/3/2018	5/12/2018	\$ (28,392.29)	\$ -	\$ -	\$ (28,392.29)	201814195F005	5/22/2018	E3	9X	CA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2018352NZ3023	12/18/2018	1/9/2018	1/15/2018	\$ (17,656.50)	\$ -	\$ -	\$ (17,656.50)	2018253AHJ001	9/12/2018	DP	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019003C53005	1/3/2019	10/1/2017	10/30/2017	\$ (10,608.34)	\$ -	\$ -	\$ (10,608.34)	20181861EP024	7/20/2018	C1	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019004N5P016	1/4/2019	1/10/2018	1/18/2018	\$ (890.98)	\$ -	\$ -	\$ (890.98)	2018088NJM025	4/2/2018	D7	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019014B44006	1/14/2019	1/9/2018	1/11/2018	\$ (4,198.19)	\$ -	\$ -	\$ (4,198.19)	2018061RZE005	3/5/2018	D7	9X	CA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019015USH011	1/15/2019	8/14/2018	8/14/2018	\$ (29.09)	\$ -	\$ -	\$ (29.09)	2018305AK1018	11/1/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019016ETX022	1/16/2019	7/30/2018	7/30/2018	\$ (51.12)	\$ -	\$ -	\$ (51.12)	2018276C1E049	10/3/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019023TJM029	1/23/2019	8/21/2018	8/21/2018	\$ (51.12)	\$ -	\$ -	\$ (51.12)	2018318AK1021	11/14/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019033ETX012	2/2/2019	8/30/2018	8/30/2018	\$ (41.14)	\$ -	\$ -	\$ (41.14)	2018328SKR026	11/24/2018	3	QA	CA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2019037B3M017	2/6/2019	7/20/2018	7/20/2018	\$ (130.32)	\$ -	\$ -	\$ (130.32)	2018257VAZ029	9/14/2018	F8	QA	CA	N

\$(109,661.94)

St. Francis Medical Center	422.24
	577.71
Total:	999.95

EXHIBIT B

Provider Name: ST. FRANCIS MEDICAL CENTER
Provider Tax ID: 912154439
Total Overpaymen (\$13,825.69)

Claim-Level Detail:

PRODUCT	STATE	PAYEE TYPE	PAYEE ID	PRV NAME	ADJ PROCESS DATE	PATIENT CONTROL	SRV FROM DATE	SRV THRU DATE	OUTSTANDING AMOUNT	REFUND	WRITE OFF	CURRENT OUTSTANDING	ORG PROCESS DATE	ADJ-CODE	HN PLAN	CONT IND	Date Added
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	3/26/2019	66262080	9/12/2018	9/13/2018	(\$136.53)	\$0.00	\$0.00	(\$136.53)	1/30/2019 D7	CA	N		3/27/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	2/20/2019	66277328	9/17/2018	9/17/2018	(\$97.96)	\$0.00	\$0.00	(\$97.96)	2/1/2019 D7	CA	N		2/21/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	3/1/2019	66276684	9/17/2018	9/17/2018	(\$97.96)	\$0.00	\$0.00	(\$97.96)	1/31/2019 D7	CA	N		3/4/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	4/23/2019	66454240	11/10/2018	11/10/2018	(\$61.87)	\$0.00	\$0.00	(\$61.87)	3/21/2019 G4	CA	N		4/24/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	6/25/2019	66518986	12/1/2018	12/2/2018	(\$136.53)	\$0.00	\$0.00	(\$136.53)	3/6/2019 E2	CA	N		6/26/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	4/24/2019	66540907	12/9/2018	12/9/2018	(\$97.96)	\$0.00	\$0.00	(\$97.96)	4/6/2019 BU	CA	N		4/25/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	4/23/2019	66590191	12/26/2018	12/26/2018	(\$66.12)	\$0.00	\$0.00	(\$66.12)	4/12/2019 EN	CA	N		4/24/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	2/19/2019	66524612	1/1/2019	1/5/2019	(\$100.00)	\$0.00	\$0.00	(\$100.00)	2/7/2019 E8	CA	Y		2/20/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	2/22/2019	66524612	1/1/2019	1/5/2019	(\$1,422.00)	\$0.00	\$0.00	(\$1,422.00)	2/19/2019 F8	CA	Y		2/25/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	5/9/2019	66637125	1/10/2019	1/10/2019	(\$261.33)	\$0.00	\$0.00	(\$261.33)	4/4/2019 EW	CA	N		5/10/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	4/26/2019	66625245	1/11/2019	1/11/2019	(\$32.91)	\$0.00	\$0.00	(\$32.91)	4/17/2019 F8	CA	N		4/29/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	5/16/2019	66658345	1/17/2019	1/17/2019	(\$122.88)	\$0.00	\$0.00	(\$122.88)	4/27/2019 D7	CA	N		5/17/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	5/8/2019	66712928	2/4/2019	2/4/2019	(\$90.20)	\$0.00	\$0.00	(\$90.20)	4/19/2019 3	CA	N		5/9/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	5/9/2019	66738022	2/11/2019	2/11/2019	(\$84.31)	\$0.00	\$0.00	(\$84.31)	4/19/2019 F1	CA	N		5/10/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	5/16/2019	66739269	2/12/2019	2/12/2019	(\$102.45)	\$0.00	\$0.00	(\$102.45)	4/27/2019 D7	CA	N		5/17/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	7/1/2019	66917030	4/8/2019	4/12/2019	(\$110.84)	\$0.00	\$0.00	(\$110.84)	6/4/2019 D7	CA	N		7/9/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/16/2019	66899642	4/12/2019	4/12/2019	(\$29.90)	\$0.00	\$0.00	(\$29.90)	5/25/2019 D7	CA	N		8/19/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	7/23/2019	66988668	5/1/2019	5/31/2019	(\$9.80)	\$0.00	\$0.00	(\$9.80)	7/13/2019 EN	CA	N		7/24/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/20/2019	67017202	5/10/2019	5/10/2019	(\$270.88)	\$0.00	\$0.00	(\$270.88)	6/25/2019 D7	CA	N		8/21/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/20/2019	67031450	5/15/2019	5/15/2019	(\$123.90)	\$0.00	\$0.00	(\$123.90)	6/25/2019 D7	CA	N		8/21/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/16/2019	67059154	5/23/2019	5/23/2019	(\$122.88)	\$0.00	\$0.00	(\$122.88)	7/1/2019 D7	CA	N		8/19/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/26/2019	67064725	5/25/2019	5/25/2019	(\$122.88)	\$0.00	\$0.00	(\$122.88)	7/9/2019 D7	CA	N		8/28/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	9/5/2019	67073320	5/29/2019	5/30/2019	(\$122.88)	\$0.00	\$0.00	(\$122.88)	7/9/2019 D7	CA	N		9/9/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/21/2019	67086520	6/1/2019	6/2/2019	(\$98.39)	\$0.00	\$0.00	(\$98.39)	7/13/2019 D7	CA	N		8/22/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/27/2019	67090050	6/3/2019	6/3/2019	(\$122.88)	\$0.00	\$0.00	(\$122.88)	7/15/2019 D7	CA	N		8/28/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	9/5/2019	67114686	6/11/2019	6/11/2019	(\$145.80)	\$0.00	\$0.00	(\$145.80)	7/24/2019 D7	CA	N		9/9/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	9/4/2019	67111708	6/14/2019	6/14/2019	(\$16.19)	\$0.00	\$0.00	(\$16.19)	7/23/2019 D7	CA	N		9/5/2019
HMO	CA	P	912154439 A	ST. FRANCIS MEDICAL CENTER	8/5/2019	67077065	7/5/2019	7/8/2019	(\$37.32)	\$0.00	\$0.00	(\$37.32)	7/31/2019 D7	CA	Y		8/6/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	3/18/2019	66265513	9/13/2018	9/13/2018	(\$66.66)	\$0.00	\$0.00	(\$66.66)	1/15/2019 BT	CA	Y		3/20/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	9/12/2019	66431487	11/3/2018	11/4/2018	(\$447.70)	\$0.00	\$0.00	(\$447.70)	2/19/2019 DP	CA	Y		9/13/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	4/3/2019	66483033	11/20/2018	11/20/2018	(\$15.00)	\$0.00	\$0.00	(\$15.00)	3/28/2019 54	CA	Y		4/4/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	9/6/2019	66487315	11/23/2018	11/23/2018	(\$159.41)	\$0.00	\$0.00	(\$159.41)	12/6/2018 DP	CA	Y		9/9/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	7/8/2019	66565961	12/19/2018	12/20/2018	(\$321.48)	\$0.00	\$0.00	(\$321.48)	2/19/2019 F0	CA	Y		7/9/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	5/2/2019	66638743	1/11/2019	1/12/2019	(\$1,644.74)	\$0.00	\$0.00	(\$1,644.74)	3/25/2019 D7	CA	Y		5/3/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	9/11/2019	66648973	1/14/2019	1/14/2019	(\$125.46)	\$0.00	\$0.00	(\$125.46)	1/28/2019 DP	CA	Y		9/12/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	8/1/2019	66659228	1/17/2019	1/17/2019	(\$210.11)	\$0.00	\$0.00	(\$210.11)	2/1/2019 U5	CA	Y		8/2/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	9/11/2019	66694118	1/29/2019	1/29/2019	(\$106.53)	\$0.00	\$0.00	(\$106.53)	2/9/2019 DP	CA	Y		9/12/2019
HMO	CA	P	912154439 C	ST FRANCIS MEDICAL CTR	9/17/2019	66753849	2/18/2019	3/5/2019	(\$6,483.05)	\$0.00	\$0.00	(\$6,483.05)	5/23/2019 C1	CA	Y		9/18/2019

EXHIBIT C

PRODUCT	STATE	PAYEE ID	PRV NAME	ADJ CLAIM ID	ADJ PROCESS DATE	PATIENT CONTROL	SRV FROM DATE	SRV THRU DATE	OUTSTANDING AMOUNT	REFUND	WRITE OFF	CURRENT OUTSTANDING	ORG CLAM ID	ORG PROCESS DATE	RMC	CONT IND
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020037GNS025	2/6/2020	67495556	10/9/2019	10/10/2019	\$ (123.90)	\$0.00	\$0.00	(\$123.90)	2019322UCX024	11/19/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020042U2Q006	2/11/2020	67497586	10/10/2019	10/10/2019	\$ (122.88)	\$0.00	\$0.00	(\$122.88)	2019306019971	11/4/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020034U2Q036	2/3/2020	67526798	10/20/2019	10/20/2019	\$ (100.34)	\$0.00	\$0.00	(\$100.34)	2019320XX8765	11/18/2019	QA	N
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2019336GNS021	12/2/2019	67526905	10/20/2019	10/20/2019	\$ (148.65)	\$0.00	\$0.00	(\$148.65)	2019310001695	11/9/2019	QE	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020034JVM026	2/3/2020	67591180	11/10/2019	11/10/2019	\$ (122.88)	\$0.00	\$0.00	(\$122.88)	20193479DZ031	12/13/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020035JT7013	2/4/2020	67605147	11/14/2019	11/15/2019	\$ (84.31)	\$0.00	\$0.00	(\$84.31)	2019355CJF016	12/21/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020043WUV023	2/12/2020	67582148	11/15/2019	11/15/2019	\$ (10.52)	\$0.00	\$0.00	(\$10.52)	2019355028392	12/23/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020013JT7025	1/13/2020	67614990	11/18/2019	11/18/2019	\$ (84.31)	\$0.00	\$0.00	(\$84.31)	2019348001300	12/16/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020035B3M006	2/4/2020	67629956	11/24/2019	11/24/2019	\$ (123.90)	\$0.00	\$0.00	(\$123.90)	20193609QX032	12/26/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020035JT7011	2/4/2020	67635458	11/26/2019	12/4/2019	\$ (247.79)	\$0.00	\$0.00	(\$247.79)	2019360AC8044	12/26/2019	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020062B3M015	3/2/2020	67690289	12/14/2019	12/15/2019	\$ (84.31)	\$0.00	\$0.00	(\$84.31)	2020011YY7292	1/13/2020	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020041G16016	2/10/2020	67699686	12/17/2019	12/17/2019	\$ (84.31)	\$0.00	\$0.00	(\$84.31)	2020014W2Y028	1/14/2020	QA	N
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020050B3M019	2/19/2020	67702076	12/18/2019	12/18/2019	\$ (70.78)	\$0.00	\$0.00	(\$70.78)	2020016A7C035	1/17/2020	QA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020065B3M031	3/5/2020	67711259	12/21/2019	12/21/2019	\$ (108.25)	\$0.00	\$0.00	(\$108.25)	2020021A43045	1/21/2020	QA	N
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020070JT7011	3/10/2020	67717819	12/24/2019	12/24/2019	\$ (84.31)	\$0.00	\$0.00	(\$84.31)	20200301AX030	1/30/2020	QA	Y
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020064VNF015	3/4/2020	67704395	12/27/2019	12/27/2019	\$ (67.20)	\$0.00	\$0.00	(\$67.20)	2020022BSG033	1/22/2020	QA	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020070VNF002	3/10/2020	67731976	12/29/2019	12/29/2019	\$ (134.75)	\$0.00	\$0.00	(\$134.75)	2020029ABQ035	1/29/2020	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020055B3M026	2/24/2020	67734988	12/30/2019	12/30/2019	\$ (16.03)	\$0.00	\$0.00	(\$16.03)	2020027060506	1/28/2020	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020071L88018	3/11/2020	67717702	1/2/2020	1/2/2020	\$ (35.89)	\$0.00	\$0.00	(\$35.89)	2020032XX9987	2/3/2020	QA	N
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020071L88021	3/11/2020	67717678	1/3/2020	1/3/2020	\$ (10.42)	\$0.00	\$0.00	(\$10.42)	2020043DGB018	2/12/2020	QA	Y
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020071L88025	3/11/2020	67751016	1/3/2020	1/3/2020	\$ (144.92)	\$0.00	\$0.00	(\$144.92)	20200459DA031	2/14/2020	QA	Y
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020088F2K021	3/28/2020	67734939	1/6/2020	1/6/2020	\$ (36.99)	\$0.00	\$0.00	(\$36.99)	2020043DGH017	2/12/2020	QA	Y
HMO	CA	912154439 C	ST FRANCIS MEDICAL CTR	2020071U2Q016	3/11/2020	67760512	1/7/2020	1/7/2020	\$ (118.58)	\$0.00	\$0.00	(\$118.58)	2020055BK7019	2/24/2020	QA	Y
CSP	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020078G16005	3/18/2020	67825554	1/28/2020	2/12/2020	\$ (1,408.00)	\$0.00	\$0.00	(\$1,408.00)	2020055900127	2/25/2020	MD	Y
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020083FJV012	3/23/2020	67832915	1/30/2020	1/30/2020	\$ (52.49)	\$0.00	\$0.00	(\$52.49)	2020056076382	2/26/2020	QA	N
HMO	CA	912154439 A	ST. FRANCIS MEDICAL CENTER	2020080VNF012	3/20/2020	67822726	1/31/2020	1/31/2020	\$ (19.71)	\$0.00	\$0.00	(\$19.71)	2020058A9X019	2/27/2020	QA	N

(\$3,646.42)

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 East, Suite 2600 Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): Objection to Cure Notice 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*) April 3, 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:

See attached list.

☒ 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*) April 3, 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.

See attached list.

☒ 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.

04/03/20
Date

Laura Vargas
Printed Name


Signature

SERVICE LIST

SERVED VIA EMAIL:

DEBTOR'S COUNSEL: Dentons US LLP – Attn: Tania M. Moyron – tania.moyron@dentons.com

DEBTOR'S INVESTMENT BANKER: Cain Brothers, a division of KeyBanc Capital Markets – Attn: James Moloney – jmoloney@cainbrothers.com

COUNSEL TO THE OFFICIAL COMMITTEE: Milbank, Tweed, Hadley & McCloy LLP – Attn: Gregory A. Bray – gbray@milbank.com

COUNSEL TO THE MASTER TRUSTEE AND SERIES 2005 BOND TRUSTEE: Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. – Attn: Daniel S. Bleck and Paul Ricotta – dsbleck@mintz.com, pricotta@mintz.com

COUNSEL TO THE SERIES 2015 NOTES TRUSTEE: McDermott Will & Emery LLP – Attn: Nathan F. Coco and Megan Preusker – ncoco@mwe.com; mpreusker@mwe.com

COUNSEL TO THE SERIES 2017 NOTES TRUSTEE: Maslon, LLP – Attn: Clark Whitmore clark.whitmore@maslon.com

COUNSEL TO THE MOB LENDERS: Jones Day and Peter Saba – bbennett@jonesday.com, brosenblum@jonesday.com, psaba@jonesday.com

OFFICE OF THE U.S. TRUSTEE: Attn: Hatty Yip – Hatty.Yip@usdoj.gov; Alvin Mar – Alvin.mar@usdoj.gov

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING:

- Alexandra Achamallah aachamallah@milbank.com, rliubicic@milbank.com
- Melinda Alonzo ml7829@att.com
- Robert N Amkraut ramkraut@foxrothschild.com
- Kyra E Andrassy kandrassy@swelawfirm.com, lgarrett@swelawfirm.com; gcruz@swelawfirm.com; jchung@swelawfirm.com
- Simon Aron saron@wrslawyers.com
- Lauren T Attard lattard@bakerlaw.com, agrosso@bakerlaw.com
- Allison R Axenrod allison@claimsrecoveryllc.com
- Richard T Baum rickbaum@hotmail.com, rickbaum@ecf.inforuptcy.com
- Cristina E Bautista cristina.bautista@kattenlaw.com, ecf.lax.docket@kattenlaw.com
- James Cornell Behrens jbehrens@milbank.com, gbray@milbank.com; mshinderman@milbank.com; dodonnell@milbank.com; jbrewster@milbank.com; JWeber@milbank.com
- Ron Bender rb@lnbyb.com
- Bruce Bennett bbennett@jonesday.com
- Peter J Benvenuti pbenvenuti@kellerbenvenuti.com, pjbenven74@yahoo.com
- Leslie A Berkoff lberkoff@moritthock.com, hmay@moritthock.com
- Steven M Berman sberman@slk-law.com, mceriale@shumaker.com
- Stephen F Biegenzahn efile@sfblaw.com
- Karl E Block kblock@loeb.com, jvazquez@loeb.com; ladocket@loeb.com; kblock@ecf.courtdrive.com
- Dustin P Branch branchd@ballardspahr.com, carolod@ballardspahr.com; hubenb@ballardspahr.com
- Michael D Breslauer mbreslauer@swsslaw.com, wyones@swsslaw.com; mbreslauer@ecf.courtdrive.com; wyones@ecf.courtdrive.com
- Chane Buck cbuck@jonesday.com

- Lori A Butler butler.lori@pbgc.gov, efile@pbgc.gov
- Howard Camhi hcamhi@ecjlaw.com, tcastelli@ecjlaw.com;amatsuoka@ecjlaw.com
- Barry A Chatz barry.chatz@saul.com, jurate.medziak@saul.com
- Shirley Cho scho@pszjlaw.com
- Shawn M Christianson cmcintire@buchalter.com, schristianson@buchalter.com
- Louis J. Cisz lcisz@nixonpeabody.com, jzic@nixonpeabody.com
- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;olivia@lesliecohenlaw.com
- Marcus Colabianchi mcolabianchi@duanemorris.com
- Kevin Collins kevin.collins@btlaw.com, Kathleen.lytle@btlaw.com
- Joseph Corrigan Bankruptcy2@ironmountain.com
- David N Crapo dcrapo@gibbonslaw.com, elrosen@gibbonslaw.com
- Mariam Danielyan md@danielyanlawoffice.com, danielyan.mar@gmail.com
- Brian L Davidoff bdavidoff@greenbergglusker.com,
calendar@greenbergglusker.com;jking@greenbergglusker.com
- Aaron Davis aaron.davis@bryancave.com, kat.flaherty@bryancave.com
- Lauren A Deeb lauren.deeb@nelsonmullins.com, maria.domingo@nelsonmullins.com
- Daniel Denny ddenny@milbank.com
- Anthony Dutra adutra@hansonbridgett.com
- Kevin M Eckhardt kevin.eckhardt@gmail.com, keckhardt@hunton.com
- Lei Lei Wang Ekvall lekvall@swelawfirm.com,
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- David K Eldan david.eldan@doj.ca.gov, cynthia.gomez@doj.ca.gov
- Andy J Epstein taxcpaesq@gmail.com
- Richard W Esterkin richard.esterkin@morganlewis.com
- Christine R Etheridge christine.etheridge@ikonfin.com
- M Douglas Flahaut flahaut.douglas@arentfox.com
- Michael G Fletcher mfletcher@frandzel.com, sking@frandzel.com
- Joseph D Frank jfrank@fgllp.com,
mmatlock@fgllp.com;csmith@fgllp.com;jkleinman@fgllp.com;csucic@fgllp.com
- William B Freeman bill.freeman@kattenlaw.com,
nicole.jones@kattenlaw.com,ecf.lax.docket@kattenlaw.com
- John-Patrick M Fritz jpf@lnbyb.com, JPF.LNBYB@ecf.inforuptcy.com
- Eric J Fromme efromme@tocounsel.com, lchapman@tocounsel.com
- Amir Gamliel amir-gamliel-9554@ecf.pacerpro.com,
cmallahi@perkinscoie.com;DocketLA@perkinscoie.com
- Jeffrey K Garfinkle jgarfinkle@buchalter.com, docket@buchalter.com;dcyrankowski@buchalter.com
- Thomas M Geher tmg@jmbm.com, bt@jmbm.com;fc3@jmbm.com;tmg@ecf.inforuptcy.com
- Lawrence B Gill lgill@nelsonhardiman.com,
rrange@nelsonhardiman.com;ksherry@nelsonhardiman.com;mmarkwell@nelsonhardiman.com
- Paul R. Glassman pglassman@sycr.com
- Aaron Matthew Gober-Sims aarongobersims@paulhastings.com, aaron.g.sims@gmail.com
- Matthew A Gold courts@argopartners.net
- Eric D Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- Marshall F Goldberg mgoldberg@glassgoldberg.com, jbailey@glassgoldberg.com
- Richard H Golubow rgolubow@wghlawyers.com,
pj@wghlaw.com;jmartinez@wghlawyers.com;Meir@virtualparalegalservices.com
- David M. Guess guessd@gtlaw.com

- Anna Gumport agumport@sidley.com
- Melissa T Harris harris.melissa@pbgc.gov, efile@pbgc.gov
- James A Hayes jhayes@zinserhayes.com, jhayes@jamesahayesaplc.com
- Michael S Held mheld@jw.com
- Lawrence J Hilton lhilton@onellp.com,
lthomas@onellp.com,info@onellp.com,rgolder@onellp.com,lhyska@onellp.com,nlichtenberger@onellp.
com
- Robert M Hirsh rhirsh@lowenstein.com
- Florice Hoffman fhoffman@socal.rr.com, floricehoffman@gmail.com
- Lee F Hoffman leehoffmanjd@gmail.com, lee@fademlaw.com
- Michael Hogue hoguem@gtlaw.com, SFOLitDock@gtlaw.com;navarrom@gtlaw.com
- Matthew B Holbrook mholbrook@sheppardmullin.com,
mmanns@sheppardmullin.com,amartin@sheppardmullin.com
- David I Horowitz david.horowitz@kirkland.com,
keith.catuara@kirkland.com;terry.ellis@kirkland.com;elsa.banuelos@kirkland.com;ivon.granados@kirkland.com
- Virginia Hoyt scif.legal.bk@scif.com
- Brian D Huben hubenb@ballardspahr.com, carolod@ballardspahr.com
- Joan Huh joan.huh@cdtfa.ca.gov
- Carol A Igoe cigoe@calnurses.org, ttschneaux@calnurses.org
- Benjamin Ikuta bikuta@hml.law
- Lawrence A Jacobson laj@cohenandjacobson.com
- John Mark Jennings johnmark.jennings@kutakrock.com, mary.clark@kutakrock.com
- Monique D Jewett-Brewster mjb@hopkinscarley.com, eamaro@hopkinscarley.com
- Crystal Johnson M46380@ATT.COM
- Gregory R Jones gjones@mwe.com, rnhunter@mwe.com
- Jeff D Kahane jkahane@duanemorris.com, dmartinez@duanemorris.com
- Steven J Kahn skahn@pszyjw.com
- Cameo M Kaisler salembier.cameo@pbgc.gov, efile@pbgc.gov
- Ivan L Kallick ikallick@manatt.com, ihernandez@manatt.com
- Ori Katz okatz@sheppardmullin.com,
cshulman@sheppardmullin.com;ezisholtz@sheppardmullin.com;lsegura@sheppardmullin.com
- Payam Khodadadi pkhodadadi@mcguirewoods.com, dkiker@mcguirewoods.com
- Christian T Kim ckim@dumas-law.com, ckim@ecf.inforuptcy.com
- Jane Kim jkim@kellerbenvenuti.com
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforuptcy.com
- Gary E Klausner gek@lnbyb.com
- David A Klein david.klein@kirkland.com
- Nicholas A Koffroth nick.koffroth@dentons.com, chris.omeara@dentons.com
- Joseph A Kohanski jkohanski@bushgottlieb.com, kprestegard@bushgottlieb.com
- David S Kupetz dkupetz@sulmeyerlaw.com,
dperez@sulmeyerlaw.com;dperez@ecf.courtdrive.com;dkupetz@ecf.courtdrive.com
- Jeffrey S Kwong jsk@lnbyb.com, jsk@ecf.inforuptcy.com
- Darryl S Laddin bkrfilings@agg.com
- Robert S Lampl advocate45@aol.com, rlisarobinsonr@aol.com
- Richard A Lapping richard@lappinglegal.com
- Paul J Laurin plaurin@btlaw.com, slmoore@btlaw.com;jboustani@btlaw.com

- Nathaniel M Leeds nathaniel@mitchellllawsf.com, sam@mitchellllawsf.com
- David E Lemke david.lemke@wallerlaw.com,
chris.cronk@wallerlaw.com;Melissa.jones@wallerlaw.com;cathy.thomas@wallerlaw.com
- Lisa Lenherr llenherr@wendel.com, bankruptcy@wendel.com
- Elan S Levey elan.levey@usdoj.gov, tiffany.davenport@usdoj.gov
- Kerri A Lyman klyman@mwe.com, lbates@mwe.com
- Tracy L Mainguy bankruptcycourtnotices@unioncounsel.net, tmainguy@unioncounsel.net
- 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
- Alvin Mar alvin.mar@usdoj.gov, dare.law@usdoj.gov
- Craig G Margulies Craig@MarguliesFaithlaw.com,
Vicky@MarguliesFaithlaw.com;Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithlaw.com
- Hutchison B Meltzer hutchison.meltzer@doj.ca.gov, Alicia.Berry@doj.ca.gov
- John J Menchaca (TR) jmenchaca@menchacacpa.com, ca87@ecfcbis.com;igaeta@menchacacpa.com
- Christopher Minier becky@ringstadlaw.com, arlene@ringstadlaw.com
- John A Moe john.moe@dentons.com, glenda.spratt@dentons.com
- Susan I Montgomery susan@simontgomerylaw.com,
assistant@simontgomerylaw.com;simontgomerylawecf.com@gmail.com;montgomerysr71631@notify.be
stcase.com
- Monserrat Morales Monsi@MarguliesFaithLaw.com,
Vicky@MarguliesFaithLaw.com;Helen@marguliesfaithlaw.com;Angela@MarguliesFaithlaw.com
- Kevin H Morse kmorse@clarkhill.com, blambert@clarkhill.com
- Marianne S Mortimer mmartin@jmbm.com
- Tania M Moyron tania.moyron@dentons.com,
chris.omeara@dentons.com;nick.koffroth@dentons.com;Sonia.martin@dentons.com;Isabella.hsu@dentons.com;lee.whidden@dentons.com;Jacqueline.whipple@dentons.com
- Alan I Nahmias anahmias@mbnlawyers.com, jdale@mbnlawyers.com
- Akop J Nalbandyan jnalbandyan@LNtriallawyers.com, cbautista@LNtriallawyers.com
- Jennifer L Nassiri jennifernassiri@quinnemanuel.com
- Charles E Nelson nelsonc@ballardspahr.com, wassweilerw@ballardspahr.com
- Sheila Gropper Nelson shedoesbklaw@aol.com
- Mark A Neubauer mneubauer@carltonfields.com,
mlrodriguez@carltonfields.com;smcloughlin@carltonfields.com;schau@carltonfields.com;NDunn@carltonfields.com;ecfla@carltonfields.com
- Fred Neufeld fneufeld@sycr.com, tingman@sycr.com
- Nancy Newman nnewman@hansonbridgett.com,
ajackson@hansonbridgett.com;calendarclerk@hansonbridgett.com
- Bryan L Ngo bngo@fortislaw.com,
BNgo@bluecapitallaw.com;SPicariello@fortislaw.com;JNguyen@fortislaw.com;JNguyen@bluecapitallaw.com
- Abigail V O'Brient avobrient@mintz.com,
docketing@mintz.com;DEHashimoto@mintz.com;nleali@mintz.com;ABLevin@mintz.com
- John R OKeefe jokeefe@metzlewis.com, slohr@metzlewis.com
- Matthew J Olson olson.matthew@dorsey.com, stell.laura@dorsey.com
- Scott H Olson solson@vedderprice.com, scott-olson2161@ecf.pacerpro.com,ecfsfdocket@vedderprice.com,nortega@vedderprice.com

- Giovanni Orantes go@gobklaw.com, gorantes@oranteslaw.com, cmh@gobklaw.com, gobklaw@gmail.com, go@ecf.inforuptcy.com; orantesgr89122@notify.bestcase.com
- Keith C Owens kowens@foxrothschild.com, khoang@foxrothschild.com
- R Gibson Pagter gibson@ppilawyers.com, ecf@ppilawyers.com; pagterr51779@notify.bestcase.com
- Paul J Pascuzzi ppascuzzi@ffwplaw.com
- Lisa M Peters lisa.peters@kutakrock.com, marybeth.brukner@kutakrock.com
- Christopher J Petersen cjpetersen@blankrome.com, gsolis@blankrome.com
- Mark D Plevin mplevin@crowell.com, cromo@crowell.com
- Steven G. Polard spolard@ch-law.com, calendarlao@rmkb.com; melissa.tamura@rmkb.com; anthony.arriola@rmkb.com
- David M Powlen david.powlen@btlaw.com, pgroff@btlaw.com
- Christopher E Prince cprince@lesnickprince.com, jmack@lesnickprince.com; cprince@ecf.courtdrive.com
- Lori L Purkey bareham@purkeyandassociates.com
- William M Rathbone wrathbone@grsm.com, jmydlandevans@grsm.com; sdurazo@grsm.com
- Jason M Reed Jason.Reed@Maslon.com
- Michael B Reynolds mreynolds@swlaw.com, kcollins@swlaw.com
- J. Alexandra Rhim arhim@hrhlaw.com
- Emily P Rich erich@unioncounsel.net, bankruptcycourtntices@unioncounsel.net
- Robert A Rich , candonian@huntonak.com
- Lesley A Riis Iriis@dpmclaw.com
- Debra Riley driley@allenmatkins.com
- Jason E Rios jrios@ffwplaw.com, sdarms@ffwplaw.com; jfluken@ffwplaw.com
- Julie H Rome-Banks julie@bindermalter.com
- Mary H Rose mrose@buchalter.com
- Gregory A Rougeau grougeau@brlawfs.com
- Megan A Rowe mrowe@dsrhealthlaw.com, lwestoby@dsrhealthlaw.com
- Nathan A Schultz nschultz@goodwinlaw.com
- Mark A Serlin ms@swllplaw.com, mor@swllplaw.com
- Seth B Shapiro seth.shapiro@usdoj.gov
- David B Shemano dshemano@shemanolaw.com
- Joseph Shickich jshickich@riddellwilliams.com
- Mark Shinderman mshinderman@milbank.com, dmuhrez@milbank.com; dlbatie@milbank.com
- Kyrsten Skogstad kskogstad@calnurses.org, rcraven@calnurses.org
- Michael St James ecf@stjames-law.com
- Andrew Still astill@swlaw.com, kcollins@swlaw.com
- Jason D Strabo jstrabo@mwe.com, cfuraha@mwe.com
- Sabrina L Streusand Streusand@slollp.com
- Ralph J Swanson ralph.swanson@berliner.com, sabina.hall@berliner.com
- Michael A Sweet msweet@foxrothschild.com, swillis@foxrothschild.com; pbasa@foxrothschild.com
- James M Toma james.toma@doj.ca.gov, teresa.depaz@doj.ca.gov
- Gary F Torrell gtorrell@health-law.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Cecelia Valentine cecelia.valentine@nlrb.gov
- Jason Wallach jwallach@ghplaw.com, g33404@notify.cincompass.com
- Kenneth K Wang kenneth.wang@doj.ca.gov,

- Jennifer.Kim@doj.ca.gov; Stacy.McKellar@doj.ca.gov; yesenia.caro@doj.ca.gov
- Phillip K Wang phillip.wang@rimonlaw.com, david.kline@rimonlaw.com
- Sharon Z. Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com
- Adam G Wentland awentland@tocounsel.com, lkwon@tocounsel.com
- Latonia Williams lwilliams@goodwin.com, bankruptcy@goodwin.com
- Michael S Winsten mike@winsten.com
- Jeffrey C Wisler jwisler@connollygallagher.com, dperkins@connollygallagher.com
- Neal L Wolf nwolf@hansonbridgett.com,
calendarclerk@hansonbridgett.com,lchappell@hansonbridgett.com
- Claire K Wu ckwu@sulmeyerlaw.com,
mviramontes@sulmeyerlaw.com;ckwu@ecf.courtdrive.com;ckwu@ecf.inforuptcy.com
- Steven D Wyllie steven.wyllie@nrlb.gov
- Hatty K Yip hatty.yip@usdoj.gov
- Andrew J Ziaja aziaja@leonardcarder.com,
sgroff@leonardcarder.com;msimons@leonardcarder.com;lbadar@leonardcarder.com
- Rose Zimmerman rzimmerman@dalycity.org