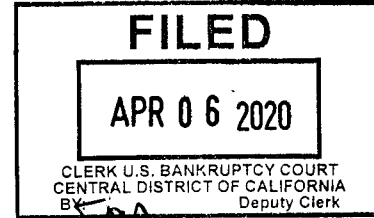


1 **Kevin P. Duthoy, Esq. (SBN# 100611)**
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4 Whittier, CA 90602-1797
5 (562) 698-9771; (562) 696-6357 Fax

6 Attorneys for Creditors PIH Health Hospital – Downey
7 And PIH Health Hospital -- Whittier



8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

10
11 In re

12 VERITY HEALTH SYSTEM OF
13 CALIFORNIA, INC., et al.

14 Debtors and Debtors in Possession

- 15 Affects All Debtors
- 16 Affects Verity Health System of 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 Foundation
- 24 Affects St. Francis Medical Center of Lynwood Foundation
- 25 Affects St. Vincent Foundation
- 26 Affects St. Vincent Dialysis Center, Inc.
- 27 Affects Seton Medical Center Foundation
- 28 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

28 Debtors and Debtors In Possession.

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

Assigned for All Purposes to:
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

Hon. Judge Ernest M. Robles
[RELATES TO DOCKET NOS. 4069, 4161, 4165]

NOTICE OF OBJECTIONS TO CLAIMS
CURE NOTICE

Hearing:

Date: April 9, 2020

Time: 10:00 am

Place: Courtroom 1568

255 E. Temple St.

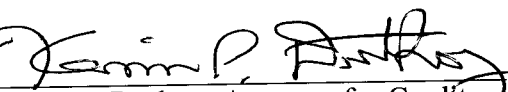
Los Angeles, CA



1 Creditors PIH Health Hospital – Downey and PIH Health Hospital – Whittier
2 (collectively "Creditors") hereby object to the cure amount listed on Exhibit "A," Part 1 (St.
3 Francis) to Debtors' notice respecting approval of sale, assumption of executory leases and
4 contracts, etc. Creditors make such objection on the ground that the amounts specified in the so-
5 called cure notice is erroneous and is, in fact, the sum of \$2,858,075 and \$2,052,961,
6 respectively. Supporting data for such claims has been previously filed with the Court as Claim
7 Nos. 919 and 4378, respectively.

8
9 Date: April 3, 2020

BEWLEY, LASSLEBEN & MILLER, LLP

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11 By: 
Kevin P. Duthoy, Attorney for Creditors

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PROOF OF SERVICE

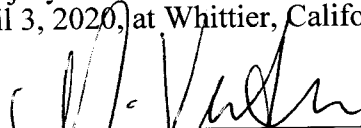
I am over the age of 18 and not a party to the within action. I am employed in the County of Los Angeles, State of California, in the office of a member of the bar of this Court at whose direction the service described herein was made. My business address is 13215 East Penn Street, Suite 510, Whittier, California 90602-1797.

On April 3, 2020, I served the foregoing document(s) described **Notice of Objections to Claims Cure Notice** as upon the person(s) shown below by placing a true and correct copy (copies) thereof to the addressee or intended recipient as follows:

SEE ATTACHED SERVICE LIST

- a. BY MAIL: by placing it (them) in a sealed envelope(s), postage prepaid, for collection and mailing on that same date following the ordinary business practices of Bewley, Lassleben & Miller, LLP (the "Firm"), at its place of business, located at 13215 East Penn Street, Suite 510, Whittier, California 90602-1797. I am readily familiar with the Firm's business practice for collection and processing of correspondence for mailing with the United States Postal Service ("USPS"), and I am informed and believe that the correspondence would be deposited with the USPS that same day in the ordinary course of business.
- b. BY OVERNIGHT DELIVERY: by placing it (them) in a sealed envelope(s), postage prepaid, to be delivered by a reputable overnight service carrier on the next day to the addressee or intended recipient by a courier or driver authorized by the carrier to receive documents, in an envelope(s) designated by the carrier for overnight service.
- c. BY FACSIMILE: by placing it (them) on the Firm's fax machine and dialing the addressee's or intended recipient's facsimile number, which is listed above or on the attached service list. I regularly maintain in the ordinary course of business transmission reports that confirm the successful transmission of facsimiles.
- d. BY ELECTRONIC MAIL: by sending an electronic copy of the above document(s) to the addressee(s) via electronic mail to the addresses:
- e. BY PERSONAL DELIVERY: by handing a service copy of the above-document to the addressee or intended recipient.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on April 3, 2020, at Whittier, California.



Natalie Ventura

SERVICE LIST

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(i) counsel to the Debtors:

Dentons US LLP
601 S. Figueroa Street, Suite 2500
Los Angeles, CA 90017
(Attn: Tania M. Moyron (tania.moyron@dentons.com))

(ii) the Debtors' Investment Banker:

Cain Brothers, a division of KeyBanc Capital Markets
1 California Street, Suite 2400
San Francisco, CA 94111
(Attn: James Moloney (jmoloney@cainbrothers.com))

(iii) counsel to the Official Committee:

Milbank, Tweed, Hadley & McCloy LLP
2029 Century Park East, 33rd Floor
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(Attn: Gregory A. Bray (gbray@milbank.com))

(iv) counsel to the Master Trustee and Series 2005 Bond Trustee:

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
One Financial Center
Boston, MA 02111
(Attn: Daniel S. Bleck and Paul Ricotta (dsbleck@mintz.com, pricotta@mintz.com))

(v) counsel to the Series 2015 Notes Trustee:

McDermott Will & Emery LLP
444 West Lake Street, Suite 4000
Chicago, IL 60606
(Attn: Nathan F. Coco and Megan Preusker (ncoco@mwe.com;
mpreusker@mwe.com))

(vi) counsel to the Series 2017 Notes Trustee:

Maslon, LLP
3300 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
(Attn: Clark Whitmore (clark.whitmore@maslon.com))

1 (vii) counsel to the MOB Lenders:

2 Jones Day

3 250 Vesey Street

4 New York, NY 10281

(Attn: Bruce Bennett, Benjamin Rosenblum, and Peter Saba (bbennett@jonesday.com,
brosenblum@jonesday.com, psaba@jonesday.com)).

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