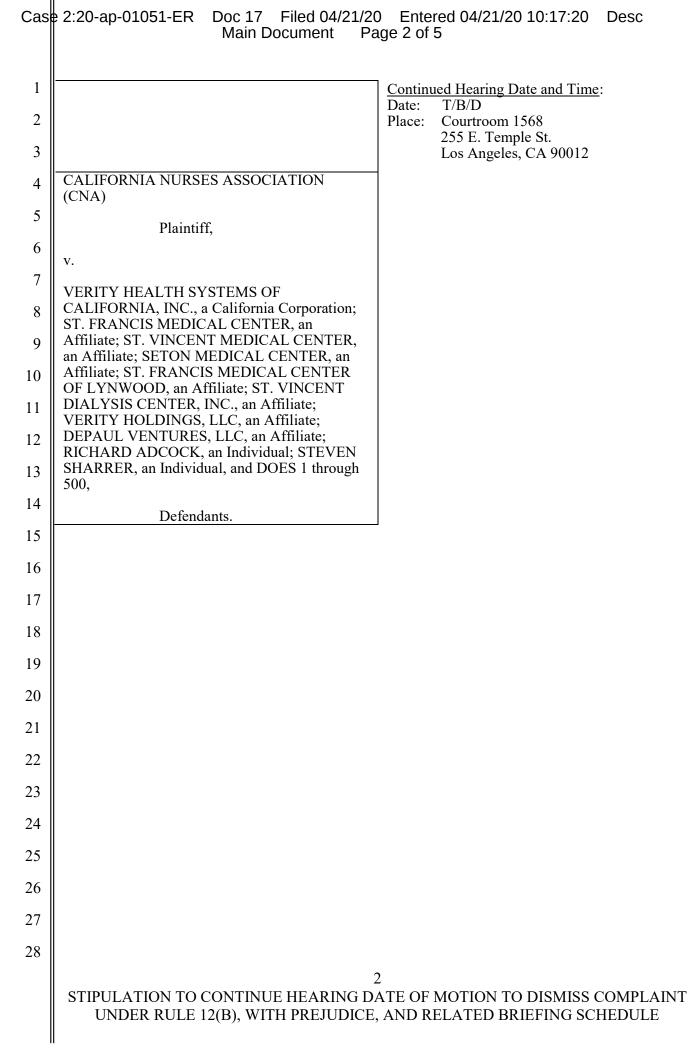
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1 2 3 4 5 6 7 8 9 10		ANKRUPTCY COURT TRICT OF CALIFORNIA -
11	LOS ANGEL	ES DIVISION
12 13	In re VERITY HEALTH SYSTEM OF	Lead Bankruptcy Case No. 2:18-bk-20151-ER Jointly Administered With: CASE NO.: 2:18-bk-20162-ER
13	CALIFORNIA, INC., <i>et al.</i> ,	CASE NO.: 2:18-bk-20102-ER CASE NO.: 2:18-bk-20163-ER CASE NO.: 2:18-bk-20164-ER
15	Debtors and Debtors In Possession.	CASE NO.: 2:18-bk-20165-ER CASE NO.: 2:18-bk-20165-ER CASE NO.: 2:18-bk-20167-ER
16	☑ Affects Verity Health System of California, Inc.	CASE NO.: 2:18-bk-20168-ER CASE NO.: 2:18-bk-20169-ER
17	□ Affects O'Connor Hospital □ Affects Saint Louise Regional Hospital	CASE NO.: 2:18-bk-20171-ER CASE NO.: 2:18-bk-20172-ER
18	 ☑ Affects St. Francis Medical Center ☑ Affects St. Vincent Medical Center 	CASE NO.: 2:18-bk-20173-ER CASE NO.: 2:18-bk-20175-ER
19	☑ Affects Seton Medical Center □ Affects O'Connor Hospital Foundation	CASE NO.: 2:18-bk-20176-ER CASE NO.: 2:18-bk-20178-ER
20	Affects Saint Louise Regional Hospital Foundation	CASE NO.: 2:18-bk-20179-ER CASE NO.: 2:18-bk-20180-ER
21	□ Affects St. Francis Medical Center of Lynwood Foundation	CASE NO.: 2:18-bk-20181-ER Chapter 11 Cases
22	 □ Affects St. Vincent Foundation ⊠ Affects St. Vincent Dialysis Center, Inc. 	Hon. Judge Ernest M. Robles
23	 Affects Seton Medical Center Foundation Affects Verity Business Services 	Adversary No. 2:20-ap-01051-ER STIPULATION TO CONTINUE HEARING
24	 ☐ Affects Verity Medical Foundation ☑ Affects Verity Holdings, LLC 	DATE OF MOTION TO DISMISS COMPLAINT UNDER RULE 12(b), WITH
25	 ☑ Affects De Paul Ventures, LLC □ Affects De Paul Ventures - San Jose ASC, LLC 	PREJUDICE, AND RELATED BRIEFING SCHEDULE
26	Debtors and Debtors In Possession.	
27		
28		
	STIPULATION TO CONTINUE HEARING D UNDER RULE 12(B), WITH PREJUDICE	1 ATE C 1820151200421000000000007 , AND RELATED BRIEFING SCHEDULE

DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 (213) 623-9300



601 South Figueroa Street, Suite 2500 Los Angeles, Calfornia 90017-5704 (213) 623-9300

STIPULATION

2 Defendants Verity Health System of California, Inc., Seton Medical Center, St. Vincent 3 Medical Center, St. Vincent Dialysis Center, Inc., St. Francis Medical Center, Verity Holdings, 4 LLC and DePaul Ventures, LLC (collectively, the "Institutional Defendants"), Defendants 5 Richard Adcock and Steven Sharrer (the "Individual Defendants," and referred to with the 6 Institutional Defendants as the ("Defendants" and individually as "Defendant"), and Plaintiff 7 California Nurses Association ("Plaintiff" or "CNA," and referred collectively with the 8 Defendants as the "Parties"), hereby enter into this Stipulation (the "Stipulation") based on the 9 following recitals of fact:

RECITALS

A. On March 5, 2020, Plaintiff CNA filed its Complaint For Damages, Civil Penalties, Attorneys Fees [Docket No. 1] (the "Complaint").

B. On March 20, 2020, Plaintiff CNA filed a *Notice of Motion and Motion of Plaintiff for Withdrawal of Reference of Adversary Proceedings Pending in Bankruptcy Court* [Docket No.
9] (the "<u>Motion to Withdraw Reference</u>"), which is pending in the United States District Court for
the Central District of California (the "<u>District Court</u>").

C. On April 6, 2020, the Institutional Defendants filed a Notice of Debtors' Motion
and Motion to Dismiss Complaint Under Rule 12(b), With Prejudice [Docket No. 12] (the
"Motion to Dismiss"), and the Individual Defendants filed a Notice of Motion and Motion by
Defendants Richard Adcock and Steven Sharrer and Joinder In Debtors' Motion to Dismiss
Complaint Pursuant to Rule 12(b)(6) [Docket No. 13].

E. The hearing on the Motion to Dismiss is currently scheduled to occur on May 6,
2020, at 10:00 a.m., at Courtroom 1568, located at 255 E Temple St., Los Angeles, CA 90012.

F. On April 16, 2020, the Parties filed an *Amended Stipulation Continuing Hearing Date of Motion to Withdraw Reference and Related Briefing Schedule* [2:20-cv-02623-SVW,
Docket No. 14] (the "District Court Stipulation") to continue the briefing and hearing schedule in
connection the Motion to Withdraw Reference, with a hearing date on the Motion to Withdraw
Reference scheduled to occur on June 1, 2020.

STIPULATION TO CONTINUE HEARING DATE OF MOTION TO DISMISS COMPLAINT UNDER RULE 12(B), WITH PREJUDICE, AND RELATED BRIEFING SCHEDULE

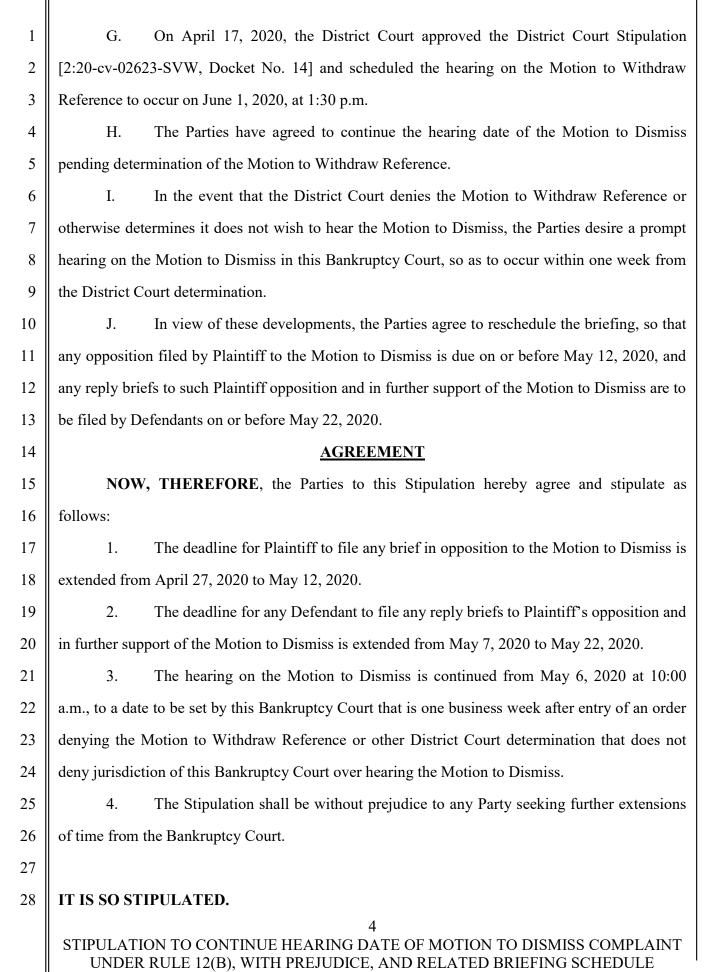
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1 2 3	Dated: April 21, 2020	DENTONS US LLP SAMUEL R. MAIZEL SAM J. ALBERTS SONIA R. MARTIN TANIA M. MOYRON
4 5		By: <u>/s/Tania M. Moyron</u> Tania M. Moyron
6 7		Counsel for Verity Health Systems of California, Inc., <i>et al.</i> and DePaul Ventures, LLC
8 9	Dated: April 21, 2020	BARTKO ZANKEL BUNZEL AN N. RUDA LOUISE ANN FERNANDEZ
10 11		By: /s/Louise Ann Fernandez
12 13		Louise Ann Fernandez Counsel for Richard Adcock and Steven
14 15		Sharrer
16 17	Dated: April 21, 2020	CALIFORNIA NURSES ASSOCIATION CAROL A. IGOE KYRSTEN B. SKOGSTAD NICOLE J. DARO
19		By: <u>/s/Kyrsten B. Skogstad</u> Kyrsten B. Skogstad
20		Kyrsten B. Skogstad Counsel for California Nurses Association
21 22		
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27 28		
	5 STIPULATION TO CONTINUE HEARING DATE OF MOTION TO DISMISS COMPLAINT UNDER RULE 12(B), WITH PREJUDICE, AND RELATED BRIEFING SCHEDULE	

DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5704 (213) 623-9300