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Debtors In Possession

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
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.

Lead 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;

Chapter 11 Cases

Hon. Ernest M. Robles

Adversary No. 2:19-ap-01002-ER

**STIPULATION FOR DISMISSAL WITH
PREJUDICE [FRCP 41(a)]**



ST. VINCENT MEDICAL CENTER, a California
nonprofit public benefit corporation and ST.
FRANCIS MEDICAL CENTER, a California
nonprofit public benefit corporation,

Plaintiffs,

v.

LOCAL INITIATIVE HEALTH AUTHORITY
FOR LOS ANGELES COUNTY DBA L.A.
CARE HEALTH PLAN, an independent local
public agency,

Defendant.

Plaintiffs, St. Vincent Medical Center and St. Francis Medical Center (together, "Plaintiffs"),
and Defendant, Local Initiative Health Authority for Los Angeles County d/b/a L.A. Care Health
Plan ("Defendant" and, together with Plaintiffs, the "Parties"), through their respective attorneys of
record,, hereby stipulate and agree that, pursuant to FRCP 41(a) made applicable to adversary
proceedings pursuant to Bankruptcy Rule 7041, and the terms of the Settlement Agreement between
the Parties approved by the Court on December 19, 2019 [Main Dkt. No. 3826], this adversary
proceeding should be dismissed with prejudice, each party to bear its own costs, expenses, including
attorney's fees.

IT IS SO STIPULATED.

Dated: May 1, 2020

HANSON BRIDGETT LLP



Neal L. Wolf

Attorneys for Local Initiative Health Authority for Los
Angeles County d/b/a L.A. Care Health Plan

Dated: May 1, 2020

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Steven J. Kahn

Steven J. Kahn

Co-Counsel to Chapter 11 Debtors and
Debtors in Possession

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:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION FOR DISMISSAL WITH PREJUDICE [FRCP 41(a)]** 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*) **May 1, 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:

- Anthony Dutra adutra@hansonbridgett.com
- Steven J Kahn skahn@pszyjw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Neal L Wolf nwolf@hansonbridgett.com,
calendarclerk@hansonbridgett.com, lchappell@hansonbridgett.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **May 1, 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.

Honorable Ernest M. Robles
U.S. Bankruptcy Court
255 E. Temple Street, Suite 1560 / Courtroom 1568
Los Angeles, CA 90012

☐ 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*) _____, 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.

☐ 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.

May 1, 2020 Mary de Leon
Date Printed Name

/s/ Mary de Leon
Signature