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Attorneys for the Chapter 11 Debtors and  
Debtors In Possession

**UNITED STATES BANKRUPTCY COURT  
FOR THE 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 ASC, LLC

Debtors and Debtors In Possession.

Lead Bankruptcy 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. Judge Ernest M. Robles

Adversary No. 2:20-ap-01051-ER

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF DEBTORS' REPLY IN  
SUPPORT OF MOTION TO DISMISS  
COMPLAINT UNDER RULE 12(b), WITH  
PREJUDICE**

Hearing Date and Time:

Date: tbd

Time: tbd

Place: Courtroom 1568  
255 E. Temple St.  
Los Angeles, CA 90012

DENTONS US LLP  
601 SOUTH FIGUEROA STREET, SUITE 2500  
LOS ANGELES, CALIFORNIA 90017-5704  
(213) 623-9300



1820151200526000000000007

CALIFORNIA NURSES ASSOCIATION (CNA)

Plaintiff,

v.

VERITY HEALTH SYSTEMS OF CALIFORNIA,  
INC., a California Corporation; ST. FRANCIS  
MEDICAL CENTER, an Affiliate; ST. VINCENT  
MEDICAL CENTER, an Affiliate; SETON  
MEDICAL CENTER, an Affiliate; ST. FRANCIS  
MEDICAL CENTER OF LYNWOOD, an Affiliate;  
ST. VINCENT DIALYSIS CENTER, INC., an  
Affiliate; VERITY HOLDINGS, LLC, an Affiliate;  
DEPAUL VENTURES, LLC, an Affiliate;  
RICHARD ADCOCK, an Individual; STEVEN  
SHARRER, an Individual, and DOES 1 through 500,

Defendants.

DENTONS US LLP  
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LOS ANGELES, CALIFORNIA 90017-5704  
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Verity Health System of California, Inc. (“VHS”), and the above-referenced affiliated debtors and debtors-in-possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Bankruptcy Cases”) pending in the United States Bankruptcy Court for the Central District of California (the “Bankruptcy Court”) and the defendants herein, hereby request that the Court take judicial notice of the following document filed and entered in the Bankruptcy Cases, pursuant to Rule 201 of the Federal Rules of Evidence,<sup>1</sup> in support of the *Debtors’ Reply In Support of Motion to Dismiss Complaint Under Rule 12(b), With Prejudice* filed concurrently herewith:

1. *Order Granting Debtors’ Ex Parte Motion for an Order Allowing the Debtors to File “Plan B” of Their Status Report Under Seal* [Bankr. Docket No. 3679]. A true and correct copy is attached hereto as Exhibit “1.”

Dated: May 22, 2020

DENTONS US LLP  
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TANIA M. MOYRON

By /s/ Tania M. Moyron  
Tania M. Moyron

Attorneys for Verity Health Systems of  
California, Inc., *et al.*

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<sup>1</sup> Rule 201 of the Federal Rules of Evidence provides that the Court “may take judicial notice at any stage of the proceeding.” *See* FED. R. EVID. 201(d).

## **EXHIBIT “1”**

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FILED & ENTERED

NOV 22 2019

CLERK U.S. BANKRUPTCY COURT  
Central District of California  
BY gonzalez DEPUTY CLERK

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.

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

Jointly Administered With:

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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. Ernest M. Robles

**ORDER GRANTING DEBTORS' EX PARTE  
MOTION FOR AN ORDER ALLOWING THE  
DEBTORS TO FILE "PLAN B" OF THEIR  
STATUS REPORT UNDER SEAL**

**[RELATES TO DOCKET NO. 3678]**

Status Conference:

Date: November 26, 2019

Time: 10:00 a.m.

Location: Courtroom 1568, 255 E. Temple St., Los  
Angeles, CA

☒ Affects All Debtors

☐ Affects Verity Health System of  
California, Inc.

☐ Affects O'Connor Hospital

☐ Affects Saint Louise Regional Hospital

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☐ 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.

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1 The Court, having read and considered the *Debtors' Ex Parte Motion Allowing The*  
2 *Debtors To File "Plan B" Of Their Status Report Under Seal* (the "Motion") [Docket No. 3678];  
3 it further appearing that proper notice of the Motion had been provided; and good and sufficient  
4 cause having been shown,

5 IT IS HEREBY ORDERED:

6 A. The Motion is GRANTED;

7 B. The Debtors may file Plan B (as defined in the Motion) under seal.

8 **IT IS SO ORDERED.**

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23  
24 Date: November 22, 2019

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26 Ernest M. Robles  
27 United States Bankruptcy Judge  
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