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11 Cigna Dental Health Plan of Arizona, Inc., and
Cigna Dental Health of Texas, Inc.
12

13 UNITED STATES BANKRUPTCY COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15 **In re**) Lead Case No. 2:18-bk-20151-ER
16 **Verity Health System of California, Inc.,**)
et al.)
17)
18 **Debtors and Debtors In Possession.**) **Re: D.I. No. 4880**
19) **OBJECTION OF CIGNA ENTITIES TO**
20) **DISCLOSURE STATEMENT**
21) **DESCRIBING AMENDED JOINT**
22) **CHAPTER 11 PLAN OF LIQUIDATION**
23) **(Dated June 16, 2020) OF THE DEBTORS,**
24) **THE PREPETITION SECURED**
25) **CREDITORS, AND THE COMMITTEE**
26)
27) Hon. Ernest M. Robles
28) Hearing: 07/02/20
Time: 10:00 a.m.

26 Cigna Healthcare of California, Inc. (“Cigna CA”), Cigna Health and Life Insurance
27 Company (“CHLIC”), Life Insurance Company of North America (“LINA”), Cigna Dental
28 Health of California, Inc., Cigna Dental Health Plan of Arizona, Inc., and Cigna Dental Health of



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1 Texas, Inc. (collectively “Cigna”) hereby object to the *Disclosure Statement Describing*
2 *Amended Joint Chapter 11 Plan of Liquidation (Dated June 16, 2020) of the Debtors, the*
3 *Prepetition Secured Creditors, and the Committee* [D.I. 4880] (“Disclosure Statement”) filed by
4 the above-captioned debtors (collectively, “Debtors”), and in support thereof, respectfully state
5 as follows:

6 **BACKGROUND**

7 1. Cigna CA, CHLIC and Debtors are parties to the Hospital Services Agreements
8 (collectively, the “Cigna Provider Agreements”) listed on Exhibit A hereto, pursuant to which
9 the Debtors, through the Seton and St. Francis medical centers that they operate, provide covered
10 healthcare services to eligible participants within the Cigna Provider Network.

11 2. LINA and the Debtors are parties to the insurance contracts (collectively, “LINA
12 Policies”) listed on Exhibit A hereto, pursuant to which LINA provides group disability benefits
13 for Debtors’ employee benefits program.

14 3. Cigna entities and the Debtors are parties to the employee dental insurance
15 policies (“Cigna Dental Policies”) listed on Exhibit A hereto, pursuant to which Cigna provides
16 group dental benefits for Debtors’ employees throughout the Verity healthcare system.

17 4. As of the date of this Objection, none of the Cigna Provider Agreements, the
18 LINA Policies, or the Cigna Dental Policies (collectively, the “Cigna Contracts”) have been
19 assumed or rejected.

20 5. Cigna timely filed Proofs of Claim asserting priority claims under 11 U.S.C. §
21 507(a)(5).

22 **OBJECTION**

23 6. For this Court to approve the Disclosure Statement, the Disclosure Statement
24 must contain information adequate to permit Cigna, as a creditor and party-in-interest, to make
25 an informed judgment about the plan. 11 U.S.C. § 1125. As set forth below, the Disclosure
26 Statement fails to provide adequate information. Therefore, Cigna objects to its approval.

27 A. **Disposition of Cigna Contracts.**

28 7. The Disclosure Statement cannot be approved because it contains insufficient

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1 information regarding the treatment of the Cigna Contracts under the *Amended Joint Chapter 11*
2 *Plan of Liquidation (Dated June 16, 2020) of the Debtors, the Prepetition Secured Creditors,*
3 *and the Committee* [D.I. 4879] (“Plan”). The Disclosure Statement provides nothing more than
4 what is already obvious: the Cigna Contracts will either be assumed or rejected by the Debtor
5 under the Plan.

6 8. Under the Plan, all Executory Contracts will be rejected as of the Effective Date,
7 unless such Executory Contracts are assumed. Plan, § 11.1. Assumed Contracts are those
8 “specifically designated” in the Schedule of Assumed Contracts that is to be served with the Plan
9 Supplement. Disclosure Statement, § VIII.F. However, under the Disclosure Statement and
10 Plan, the Debtors can unilaterally modify the Schedule of Assumed Contracts “to include or
11 delete any Executory Agreements” up to thirty (30) days after the Effective Date. Disclosure
12 Statement § VIII.F.; Plan, § 11.1. The Disclosure Statement does not, therefore, provide Cigna
13 with adequate information regarding the treatment of the Cigna Contracts under the Plan.

14 9. Effectively, any order confirming the Plan will constitute an order approving the
15 assumption or rejection of executory contracts by the Debtor, as of the Effective Date of the
16 Plan. Thus, the Debtor must actually decide whether to assume or reject the Cigna Contracts
17 before an order is entered approving such relief, and Cigna must be provided with notice and an
18 advance opportunity to be heard.

19 10. As proposed, the Disclosure Statement and Plan provide Cigna with no
20 opportunity to object and be heard with respect to the ultimate treatment of the Cigna Contracts
21 under the Plan. The Schedule of Assumed Contracts will not be final until after the deadline to
22 object to assumption/rejection, after the deadline for submitting votes with respect to the Plan,
23 after the Plan Confirmation Hearing, and after the Effective Date. Cigna cannot evaluate or
24 object to assumption/rejection related issues, and/or vote on the Plan without knowing the
25 proposed treatment of the Cigna Contracts.

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1 11. This objection can be resolved through the inclusion of the following language in
2 any order approving the Disclosure Statement:

3 The Debtors shall, no later than five (5) business days prior to the
4 hearing on confirmation of the Plan, provide Cigna with written
5 notice of its irrevocable decision as to whether or not the Debtors
propose to assume or reject each of the Cigna Contracts as part of
the Plan.

6 B. Treatment of Priority Non-Tax Claims.

7 12. Under the Plan, Priority Tax Claims are categorized with Administrative Expense
8 and Priority Claims. Plan, § 2. Priority Non-Tax Claims are categorized with all non-
9 Administrative Claims, other than Priority Tax Claims. Plan §§ 3, 4. While both sets of claims
10 are proposed to be paid in full, the timing of payment is uncertain. Specifically, the timing of
11 payment on both sets of claims is qualified by “or as soon as reasonably practicable.” Plan §§
12 2.4, 4.1(b).

13 13. Priority Tax Claims are entitled to priority under section 507(a)(8) of the
14 Bankruptcy Code, and can not be paid prior to the full payment of Cigna’s claims, which are
15 entitled to priority under section 507(a)(5) of the Bankruptcy Code. To the extent that the Plan
16 permits Allowed Priority Tax Claims to receive any distribution before Allowed Non-Tax
17 Priority Claims (including Cigna’s Non-Tax Priority Claims) are paid in full, the Plan violates
18 the fundamental creditor priorities provided by the Bankruptcy Code. *See*, 11 U.S.C. §§ 507(a),
19 1129(a). The Disclosure Statement and Plan do not assure or otherwise address this requirement.
20 Thus, the information in the Disclosure Statement is inadequate for purposes of 11 U.S.C. §
21 1125(b), and the Disclosure Statement cannot be approved.

22 14. To resolve this objection, the Disclosure Statement and Plan must be amended to
23 clarify that no Claims with priority junior to Allowed Non-Tax Priority Claims, including
24 Allowed Priority Tax Claims, shall receive any distribution until Allowed Non-Tax Priority
25 Claims have been paid, or reserved, in full.

26 WHEREFORE, Cigna respectfully requests that this Court enter an order that: (i) denies
27 the approval of the Disclosure Statement except as consistent with the foregoing; and (ii) grants
28 Cigna such additional relief to Cigna as this Court deems just and equitable.

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Dated: June 23, 2020

GORDON REES SCULLY MANSUKHANI, LLP

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EXHIBIT A TO CIGNA'S OBJECTION TO DISCLOSURE STATEMENT

Cigna Provider Agreements

- *Hospital Services Agreement* between Cigna HealthCare of California, Inc., Cigna Health and Life Insurance Company and Seton Medical Center, effective May 1, 2017, including all amendments, addendums, exhibits, schedules, etc. related thereto.
- *Hospital Services Agreement* between Cigna HealthCare of California, Inc., Cigna Health and Life Insurance Company and St. Francis Medical Center, effective May 1, 2017, including all amendments, addendums, exhibits, schedules, etc. related thereto.

LINA Policies

- Short Term Disability Policy between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of Seton Medical Center, effective January 1, 2017, Policy #VDT-962215, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- Long Term Disability Policy between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of Seton Medical Center, effective January 1, 2017, Policy #LK-965155, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- Short Term Disability Policy between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of St. Francis Medical Center, effective January 1, 2017, Policy #VDT-962211, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- Long Term Disability Policy between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of St. Francis Medical Center, effective January 1, 2017, Policy #LK-965152, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- *Short Term Disability Policy* between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of Verity Business Services, effective 1/1/17, Policy # VDT601867, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- *Long Term Disability Policy* between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of Verity Business Services, effective 1/1/17, Policy # SGD608222, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- *Short Term Disability Policy* between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of Verity Business Services, effective 1/1/17, Policy # VDT601866, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.
- *Long Term Disability Policy* between Life Insurance Company of North America and Sagewell Healthcare Benefits Trust on behalf of Verity Business Services, effective

1/1/17, Policy # SGD608221, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.

- *Administrative Services Agreement*, between LINA and Verity Health Systems, effective 9/16/15, Policy # FML601866, including all amendments, addendums, exhibits, schedules, riders, etc. related thereto.

Cigna Dental Policies

- Group Dental Care Insurance between Cigna Health and Life Insurance Company and Verity Health System, effective 1/1/17, Policy # 3211836.
- Group Dental Insurance between Cigna Dental Health of California, Inc. and Verity Health System, effective 1/1/18, Policy # 3211836.
- Group Dental Insurance between Cigna Dental Health of Texas, Inc. and Verity Health System, effective 1/1/18, Policy # 3211836.
- Group Dental Insurance between Cigna Dental Health Plan of Arizona, Inc. and Verity Health System, effective 1/1/18, Policy # 3211836.

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:
101 W. Broadway Suite 2000 San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*): **OBJECTION OF CIGNA ENTITIES TO DISCLOSURE STATEMENT DESCRIBING AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION (DATED JUNE 16, 2020) OF THE DEBTORS, THE PREPETITION SECURED CREDITORS, AND THE COMMITTEE**

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*) June 23, 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:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) June 23, 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.

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*) June 23, 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.

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.

June 23, 2020

Sylvia Durazo



Date

Printed Name

Signature

SERVICE LIST

(Via NEF)

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