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7 Debtors In Possession

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

9 In re:
10 VERITY HEALTH SYSTEM OF CALIFORNIA,
INC., *et al.*,
11 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

- 13 Affects All Debtors
- 14 Affects Verity Health System of California, Inc.
- 15 Affects O'Connor Hospital
- 16 Affects Saint Louise Regional Hospital
- 17 Affects St. Francis Medical Center
- 18 Affects St. Vincent Medical Center
- 19 Affects Seton Medical Center
- 20 Affects O'Connor Hospital Foundation
- 21 Affects Saint Louise Regional Hospital Foundation
- 22 Affects St. Francis Medical Center of Lynwood
Foundation
- 23 Affects St. Vincent Foundation
- 24 Affects St. Vincent Dialysis Center, Inc.
- 25 Affects Seton Medical Center Foundation
- 26 Affects Verity Business Services
- 27 Affects Verity Medical Foundation
- 28 Affects Verity Holdings, LLC
- Affects De Paul Ventures, LLC
- Affects De Paul Ventures - San Jose Dialysis, LLC

Chapter 11 Cases
Hon. Judge Ernest M. Robles

**STIPULATION CONTINUING OBJECTION
DEADLINE OF CALIFORNIA ATTORNEY
GENERAL RELATED TO MOTION TO APPROVE
DISCLOSURE STATEMENT DESCRIBING
AMENDED JOINT CHAPTER 11 PLAN OF
LIQUIDATION (DATED JUNE 16, 2020) AND
RELATED RELIEF [RELATED DOCKET NOS.
4879, 4880, 4881, 4889, 4893]**

Hearing:

Date: July 2, 2020
Time: 10:00 a.m. (Pacific Time)
Place: Courtroom 1568
255 East Temple Street
Los Angeles, California 90012

Debtors and Debtors In Possession.



1 **STIPULATION**

2 This Stipulation is entered into between Verity Health System Of California, Inc. (“VHS”) and
3 the above-referenced affiliated debtors, the debtors and debtors in possession in the above-captioned
4 chapter 11 bankruptcy cases (collectively, the “Debtors”), on the one hand, and Xavier Becerra,
5 California Attorney General (the “Attorney General”), on the other hand.

6 **RECITALS**

7 A. On June 16, 2020, the Debtors filed the *Amended Joint Chapter 11 Plan of Liquidation*
8 (*Dated June 16, 2020*) [Docket No. 4879] (the “Plan”), related disclosure statement [Docket No. 4880]
9 (the “Disclosure Statement”), and *Joint Motion for an Order Approving: (I) Proposed Disclosure*
10 *Statement; (II) Solicitation and Voting Procedures; (III) Notice and Objection Procedures for*
11 *Confirmation of Amended Joint Plan; (IV) Setting Administrative Claims Bar Date; and (V) Granting*
12 *Related Relief* [Docket No. 4881] (the “Motion”).¹ The Motion seeks entry of an order (i) approving
13 the Disclosure Statement as containing “adequate information,” as that term is defined in § 1125(a)(1);
14 (ii) establishing procedures for solicitation and tabulation of votes to accept or reject the Plan,
15 including (a) approving the form and manner of the solicitation packages, (b) approving the form and
16 manner of notice of the hearing to confirm the Plan, (c) establishing a voting record date and approving
17 procedures for distributing the solicitation packages, (d) approving the forms of ballots,
18 (e) establishing the deadline for the receipt of ballots, and (f) approving procedures for tabulating
19 acceptances and rejections of the Plan; (iii) establishing procedures with respect to, and the deadline
20 for filing objections to, the confirmation of the Plan; (iv) fixing July 29, 2020, as the deadline for
21 holders of Administrative Claims to file requests for payment of Administrative Claims arising, or
22 anticipated to arise, between the Initial Administrative Claims Bar Date and August 12, 2020; and
23 (v) granting related relief.

24 B. On June 17, 2020, the Court entered an order [Docket No. 4889] setting the hearing on
25 the Motion for July 2, 2020, at 10:00 a.m., requiring that parties file any objections to the Motion not
26 later than June 23, 2020 (the “Objection Deadline”), and requiring that parties file replies in support
27 of the Motion not later than June 29, 2020, at 12:00 p.m. (Pacific Time) (the “Reply Deadline”).

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¹ Except as otherwise defined herein, all capitalized terms have the definitions set forth in the Motion.

1 C. The Debtors and Attorney General have agreed to continue the Objection Deadline for
2 any objection to the Motion filed by the Attorney General (an “Objection”) and the related Reply
3 Deadline.

4 **AGREEMENT**

5 **NOW, THEREFORE**, the parties to this Stipulation hereby agree and stipulate as follows:

6 1. The deadline for the Attorney General to file an Objection shall be continued from June
7 23, 2020, to June 25, 2020.

8 2. The Reply Deadline for any Objection shall be continued from June 29, 2020, at 12:00
9 p.m. (Pacific Time) to June 30, 2020, at 12:00 p.m. (Pacific Time).

10
11 **Verity Health System of California, Inc., et al.**

12 /s/ Tania M. Moyron
13 Samuel R. Maizel
14 Tania M. Moyron
15 Dentons US LLP
16 Counsel to Debtors and Debtors In Possession

17 **Office of the Attorney General for the State of California**

18 /s/ David K. Eldan²
19 David K. Eldan
20 Office of the California Attorney General
21 Counsel to Xavier Becerra, California Attorney General

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23
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25 _____
26 ² Pursuant to the Court’s Amended General Order 20-02, the Debtors (i) are unable to obtain the
27 foregoing party’s holographic signatures due to a lack of required technology, (ii) obtained the party’s
28 permission to sign this document on the party’s behalf, and (iii) will obtain and file the holographic
signature required pursuant to LBR 9011-1(a) as soon as practicable. *See In re Amended Procedures
for Public Emergency Related to COVID-19 Outbreak*, Amended General Order 20-02, at ¶ 7 (Bankr.
C.D. Cal. Apr. 1, 2020); *see also* Third Amended General Order 20-02, at ¶ 1 (Bankr. C.D. Cal. May
28, 2020) (extending Amended General Order 20-02 through June 30, 2020).