

1 SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
2 TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
3 SAM J. ALBERTS (*pro hac vice*)
sam.alberts@dentons.com
4 DENTONS US LLP
601 South Figueroa Street, Suite 2500
5 Los Angeles, California 90017-5704
Tel: (213) 623-9300 / Fax: (213) 623-9924
6 Attorneys for the Chapter 11 Debtors and
Debtors In Possession

7
8 **UNITED STATES BANKRUPTCY COURT**
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

9 In re

10 VERITY HEALTH SYSTEM OF
11 CALIFORNIA, INC., *et al.*,

12 Debtors and Debtors In
Possession.

- 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

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

Hon. Judge Ernest M. Robles

**SUPPLEMENTAL NOTICE REGARDING WITHDRAWAL
BY THE UNITED NURSES ASSOCIATIONS OF
CALIFORNIA/UNION OF HEALTH CARE
PROFESSIONALS OF CERTAIN DISPUTED DISCOVERY
ITEMS RE DEBTORS' OMNIBUS REPLY, STIPULATION
AND MOTIONS UNDER § 1113 OF THE BANKRUPTCY
CODE REGARDING ST. FRANCIS MEDICAL CENTER**

**[Relates to Docket Nos. 4741, 4742, 4800, 4806,
4861, 4862, 4987]**

Hearing:

Date: June 8, 2020

Time: 10:00 am

Location: Courtroom 1568

255 E. Temple St., Los Angeles, CA

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



SUPPLEMENTAL NOTICE

Verity Health System of California, Inc., a California nonprofit public benefit corporation and the Debtor herein, and the above-referenced affiliated debtors, the debtors and debtors in possession in the above-captioned chapter 11 bankruptcy cases (the “Debtors”), hereby supplement (the “Supplement”) their reply (the “Reply”) [Docket No. 4987] and the related stipulation (the “Stipulation”) ¹ between the Debtors and United Nurses Associations of California/Union of Health Care Professionals (“UNAC”), attached as Exhibit “A” to the Reply [Docket No. 4987-1], as follows:

- On July 3, 2020, starting at approximately 8:00 a.m. (PDT), the Debtors, UNAC and Prime Healthcare Services, Inc. (“Prime”) had a conference call regarding the disputed items set forth in the Stipulation. UNAC informed the Debtors and Prime of certain UNAC Disputed Items that are no longer in dispute, and, consequently, UNAC has “withdrawn” any disputes as to those items. Given UNAC’s limited filing capabilities over the holiday, the Debtors agreed to file the Supplement and update the Court.
- Per UNAC, the following UNAC requests are withdrawn as to the Debtors:
 - Item I (RFI 3.1)
 - Item III (RFI 3.6)
 - Item IV (RFI 3.9)
 - Item VII (RFI 3.15)
 - Item IX (RFI 4.4)
 - Item XI (RFI 4.6)
 - Item XII (RFI 4.11)
- Per UNAC, the following UNAC requests remain in dispute as to the Debtors:
 - Item II (RFI 3.5)
 - Item V (RFI 3.13)
 - Item VI (RFI 3.14)
 - Item VIII (RFI 4.3)
 - Item X (RFI 4.5)
- Per UNAC, UNAC withdraws all UNAC Disputed Items as to any requested information from Prime.
- Per UNAC, UNAC is in the process of reviewing the status of the remaining UNAC Disputed Items, particularly Item V.

¹ Unless otherwise defined, all defined terms shall have the meaning ascribed to them in the Stipulation.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 3, 2020

DENTONS US LLP
SAMUEL R. MAIZEL
SAM J. ALBERTS
TANIA M. MOYRON

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

Attorneys for the Chapter 11 Debtors and
Debtors In Possession

BUSH GOTTLIEB, a Law Corporation
Joseph A. Kohanski
Ira L. Gottlieb
Kirk M. Prestegard

By: /s/ Joseph A. Kohanski
Joseph A. Kohanski

Counsel to the United Nurses Associations of
California

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