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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 ASC,  
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. Judge Ernest M. Robles

**STIPULATION CONTINUING DEADLINES RELATED  
TO ANY CONFIRMATION OBJECTION FILED BY  
APPLECARE MEDICAL GROUP, INC., APPLECARE  
MEDICAL GROUP, ST. FRANCIS INC., AND  
APPLECARE MEDICAL MANAGEMENT LLC  
RELATES TO DOCKET NOS. 4993, 4997**

Hearing Date and Time:

Date: August 12, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Courtroom 1568

255 E. Temple St.

Los Angeles, CA 90012



**STIPULATION**

This stipulation is entered into between Verity Health System Of California, Inc. and the above-referenced affiliated debtors and debtors in possession in the above captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), on the one hand, and AppleCare Medical Group, Inc., (“ACMG”), AppleCare Medical Group, St. Francis Inc., (“ACMGSF”) and AppleCare Medical Management LLC (“ACMM” and together with ACMG and ACMGSF, “AppleCare”), on the other.

**RECITALS**

A. On July 2, 2020, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and the Committee* [Docket No. 4993] (the “Plan”) and related *Disclosure Statement Describing Second Amended Joint Chapter 11 Plan of Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and the Committee* [Docket No. 4994].

B. On July 2, 2020, the Court entered the *Order Granting Joint Motion for an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting Procedures; (III) Notice and Objection Procedures for Confirmation of Amended Joint Plan; (IV) Setting Administrative Claims Bar Date; and (V) Granting Related Relief* [Docket No. 4997] (the “Order”), setting the hearing on confirmation of the Plan (the “Confirmation Hearing”) on August 12, 2020, at 10:00 a.m. (Pacific Time). *See* Order at 14. The Court also set July 30, 2020, as the deadline to file objections (an “Objection”) to confirmation of the Plan (the “Objection Deadline”) and August 5, 2020, as the deadline to file replies (the “Reply Deadline”) in support of the Plan. *See id.* at 15-16.

C. The Parties are engaged in negotiations concerning the Plan, and jointly agree to extend the Objection Deadline and Reply Deadline to allow additional time to engage in negotiations.

**AGREEMENT**

NOW, THEREFORE, all of the Parties to this Stipulation hereby stipulate and agree as follows:

1           1.       The Objection Deadline for AppleCare shall be extended from July 30, 2020, to  
2 August 3, 2020.

3           2.       The Reply Deadline shall be extended from August 5, 2020, to August 7, 2020,  
4 with respect to any Objection filed by AppleCare.

5  
6 Dated: July 30, 2020

DENTONS US LLP

7  
8 By: /s/ Tania M. Moyron

Tania M. Moyron

9 Counsel to the Debtors and Debtors in Possession

10 Dated: July 30, 2020

LAW OFFICE OF SUSAN I. MONTGOMERY

11  
12 By: \_\_\_\_\_  
SUSAN I. MONTGOMERY

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14 Attorneys for AppleCare Medical Group, Inc.  
15 AppleCare Medical Group, St. Francis Inc.  
16 AppleCare Medical Management LLC  
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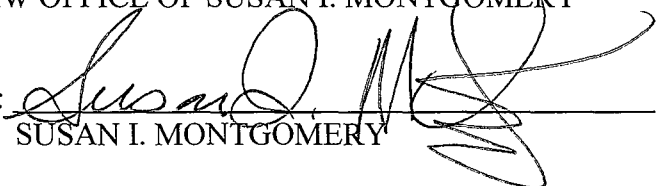
Dated: July 30, 2020

DENTONS US LLP

By: \_\_\_\_\_  
Tania M. Moyron  
Counsel to the Debtors and Debtors in Possession

Dated: July 30, 2020

LAW OFFICE OF SUSAN I. MONTGOMERY

By:   
SUSAN I. MONTGOMERY

Counsel to AppleCare Medical Group, Inc. AppleCare Medical Group, St. Francis Inc. AppleCare Medical Management LLC

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