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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 UNITEDHEALTHCARE
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 UHC of California doing business as UnitedHealthcare of California and formerly known as PacifiCare of California, a California corporation (collectively referred to as “UHC”), 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. The Objection Deadline for UHC shall be extended from July 30, 2020, to August

1 3, 2020.

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

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5 Dated: July 30, 2020

DENTONS US LLP

6 By: /s/ Tania M. Moyron

7 Tania M. Moyron

8 Counsel to the Debtors and Debtors in Possession

9 Dated: July 30, 2020

SHIPMAN & GOODMAN, LLP

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11 By: _____

ERIC S. GOLDSTEIN (admitted *pro hac vice*)

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13 Counsel to UHC of California
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DENTONS US LLP

6 By: _____
7 Tania M. Moyron

8 Counsel to the Debtors and Debtors in Possession

9 Dated: July 30, 2020

SHIPMAN & GOODMAN, LLP

10 By: Eric Goldstein
11 ERIC S. GOLDSTEIN (admitted *pro hac vice*)

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13 Counsel to UHC of California
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