

SAMUEL R. MAIZEL (Bar No. 189301)  
samuel.maizel@dentons.com  
TANIA M. MOYRON (Bar No. 235736)  
tania.moyron@dentons.com  
NICHOLAS A. KOFFROTH (Bar. No. 287854)  
nicholas.koffroth@dentons.com  
DENTONS US LLP  
601 South Figueroa Street, Suite 2500  
Los Angeles, California 90017-5704  
Tel: (213) 623-9300 / Fax: (213) 623-9924

Attorneys for the Chapter 11 Debtors and  
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  
SCAN HEALTH PLAN  
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 SCAN Health Plan, a California nonprofit public benefit corporation (“SCAN”), 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 SCAN shall be extended from July 30, 2020, to August 3, 2020.

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

Dated: July 30, 2020

DENTONS US LLP

By: /s/ Tania M. Moyron

Tania M. Moyron

Counsel to the Debtors and Debtors in Possession

Dated: July 30, 2020

LOEB & LOEB LLP

By: /s/ Daniel B. Besikof

Karl E. Block

Daniel B. Besikof

Lisa E. Rubin

Attorneys for SCAN Health Plan, a California  
nonprofit public benefit corporation

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