

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

**SECOND STIPULATION CONTINUING DEADLINES
RELATED TO ANY CONFIRMATION OBJECTION FILE
BY INTEGRITY HEALTHCARE, LLC
[RELATES TO DOCKET NOS. 4993, 4997, 5280]**

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 Integrity Healthcare, LLC (“Integrity”), 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. On July 30, 2020, the Bankruptcy Court entered the *Order Approving Stipulation Continuing Deadlines Related to Any Confirmation Objection Filed by Integrity Healthcare, LLC* [Docket No. 5280], extending (i) Integrity's Objection Deadline to August 3, 2020 and (ii) the Reply Deadline to August 5, 2020 in respect of any Objection filed by Integrity.

C. The Parties are engaged in negotiations concerning the Plan, and jointly agree to extend the extended Objection Deadline and extended 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 extended Objection Deadline for Integrity shall be extended from August 3, 2020, to August 5, 2020.

2. The extended Reply Deadline shall be extended from August 7, 2020, to August 9, 2020, with respect to any Objection filed by Integrity.

Dated: August 3, 2020

DENTONS US LLP

By: /s/ Tania M. Moyron

Tania M. Moyron

Counsel to the Debtors and Debtors in Possession

Dated: August 3, 2020

JONES DAY

By: /s/ Peter S. Saba

Bruce S. Bennett

Benjamin Rosenblum

Peter S. Saba

Counsel to Integrity Healthcare, LLC

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