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7 Attorneys for the Chapter 11 Debtors and
Debtors In Possession

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

10 In re
11 VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,
12 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

- 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 ASC,
LLC

Chapter 11 Cases
Hon. Judge Ernest M. Robles

**THIRD STIPULATION CONTINUING REPLY
DEADLINE RELATED TO CONFIRMATION
OBJECTION FILED BY APPLICARE MEDICAL
GROUP, INC., APPLICARE MEDICAL GROUP ST.
FRANCIS, INC., AND APPLICARE MEDICAL
MANAGEMENT, LLC**

**[RELATES TO DOCKET NOS. 4993, 4997, 5301, 5339,
5398, 5422]**

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

Debtors and Debtors In Possession.

DENTONS US LLP
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1 **STIPULATION**

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

7 **RECITALS**

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

13 B. On July 2, 2020, the Court entered the *Order Granting Joint Motion for an Order*
14 *Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting Procedures; (III)*
15 *Notice and Objection Procedures for Confirmation of Amended Joint Plan; (IV) Setting*
16 *Administrative Claims Bar Date; and (V) Granting Related Relief* [Docket No. 4997] (the
17 “Order”), setting the hearing on confirmation of the Plan (the “Confirmation Hearing”) on August
18 12, 2020, at 10:00 a.m. (Pacific Time). *See* Order at 14. The Court also set July 30, 2020, as the
19 deadline to file objections to confirmation of the Plan (the “Objection Deadline”) and August 5,
20 2020, as the deadline to file replies (the “Reply Deadline”) in support of the Plan. *See id.* at 15-
21 16.

22 C. On July 31, 2020, the Court entered an order [Docket No. 5301] approving a
23 stipulation [Docket No. 5284] between the parties to continue the AppleCare Objection Deadline
24 to August 3, 2020, and continue the Reply Deadline for any objection filed by AppleCare to
25 August 7, 2020.

26 D. On August 3, 2020, AppleCare filed *AppleCare Medical Group, Inc., AppleCare*
27 *Medical Group St. Francis, Inc., and AppleCare Medical Management, LLC’s Objection to*
28 *Confirmation of Joint Chapter 11 Plan of Liquidation of Verity Health System of California and*

1 *its Affiliated Debtors* [Docket No. 5339] (the “Objection”). The parties have entered into
2 stipulations [Docket Nos. 5398, 5422] to continue the Reply Deadline with respect to the
3 Objection. The current Reply Deadline is August 10, 2020, at 5:00 p.m. (Pacific Time).

4 E. The Parties continue to engage in negotiations concerning the Plan and the
5 Objection, and jointly agree to extend the Reply Deadline to allow additional time to engage in
6 negotiations.

7 **AGREEMENT**

8 NOW, THEREFORE, all of the Parties to this Stipulation hereby stipulate and agree that
9 the Reply Deadline shall be extended from August 10, 2020, at 5:00 p.m. (Pacific Time), to
10 August 11, 2020, at 12:00 p.m. (Pacific Time), with respect to the Objection.

11 Dated: August 10, 2020

DENTONS US LLP

12 By: /s/ Tania M. Moyron

Tania M. Moyron

13 Counsel to the Debtors and Debtors in Possession

14 Dated: August 10, 2020

LAW OFFICE OF SUSAN I. MONTGOMERY

15 By: _____

Susan I. Montgomery

16 Counsel to AppleCare Medical Group, Inc., AppleCare
17 Medical Group St. Francis, Inc., and AppleCare
18 Medical Management, LLC
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12 By: _____

Tania M. Moyron

13 Counsel to the Debtors and Debtors in Possession

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15
16 Dated: August 10, 2020

LAW OFFICE OF SUSAN I. MONTGOMERY

17 By:  _____

Susan I. Montgomery

18 Counsel to AppleCare Medical Group, Inc., AppleCare
19 Medical Group St. Francis, Inc., and AppleCare
20 Medical Management, LLC
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