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Counsel to Verity Health Defendants  
and Chapter 11 Debtors and Debtors In Possession

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In re

VERITY HEALTH SYSTEM OF  
CALIFORNIA, INC., *et al.*

Debtors and Debtors in  
Possession.

Case No.: 2:20-cv-02623-SVW

Bankr. Lead Case No.: 2:18-bk-20151-  
ER

Adversary Proceeding Case No.: 2:20-  
ap-1051-ER

Hon. Stephen V. Wilson

California Nurses Association CNA,

Plaintiff,

v.

Verity Health System of California, Inc., *et al.*

Defendant(s).

**NOTICE OF PENDING  
SETTLEMENT**



**NOTICE OF PENDING SETTLEMENT**

PLEASE TAKE NOTICE that Defendants Verity Health System of California, Inc., a California nonprofit public benefit corporation, St. Vincent Medical Center, a California nonprofit public benefit corporation, St. Vincent Dialysis Center, Inc., a California nonprofit public benefit corporation, and St. Francis Medical Center, a California nonprofit public benefit corporation, Seton Medical Center, a California nonprofit public benefit corporation, and Verity Holdings, LLC, a California limited liability company, Richard Adcock, Steven Sharrer, and Plaintiff California Nurses Association (“CNA”), (collectively, the “Parties”), have reached a settlement of adversary proceeding, Adversary Proceeding No. 20-01051 (the “Adversary Proceeding”), pending in the United States Bankruptcy Court for the Central District of California (the “Bankruptcy Court”).

The Parties have agreed to the terms of a Settlement Agreement (the “Agreement”), which is subject to approval by the Bankruptcy Court, pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure.

The Parties will file a motion to approve the Agreement with the Bankruptcy Court on or before August 14, 2020 (the “Motion”). Upon entry of an order approving the Motion by the Bankruptcy Court, the Parties will file a stipulation in the Bankruptcy Court requesting dismissal of the Adversary Proceeding. The Parties will either file a notice of resolution with this Court or CNA will withdraw its motion to withdraw the reference.

Accordingly, the Parties request that this Court either continue or vacate the hearing scheduled for August 31, 2020. The Parties will alert this Court if the Bankruptcy Court does not approve the Motion and associated Agreement and this matter needs to be placed on calendar again.

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1 Dated: August 11, 2020

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By: /s/ Tania M. Moyron  
Tania M. Moyron

Counsel for Verity Health Systems of  
California, Inc., *et al.*

8 Dated: August 11, 2020

**BARTKO ZANKEL BUNZEL**  
AN N. RUDA  
LOUISE ANN FERNANDEZ

By: /s/ Louise Ann Fernandez  
Louise Ann Fernandez

Counsel for Richard Adcock and Steven  
Sharrer

15 Dated: August 11, 2020

**CALIFORNIA NURSES  
ASSOCIATION**  
CAROL A. IGOE  
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NICOLE J. DARO

By: /s/ Kyrsten B. Skogstad  
Kyrsten B. Skogstad

Counsel for California Nurses Association

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Tania M. Moyron, attest that all other  
signatories listed, and on whose behalf this filing is submitted, concur in the filing's  
content and have authorized the filing.

/s/ Tania M. Moyron