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**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re

LEAD CASE NO.: 2:18-bk-20151-ER

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

CHAPTER: 11  
JOINTLY ADMINISTERED WITH:

Debtors and Debtors in Possession.

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

- ☒ 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

**LIMITED OBJECTION OF STRATEGIC  
GLOBAL MANAGEMENT, INC. TO  
FORM OF ORDER CONFIRMING  
MODIFIED SECOND AMENDED JOINT  
CHAPTER 11 PLAN OF LIQUIDATION  
(DATED JULY 2, 2020) OF THE  
DEBTORS, THE PREPETITION**



☐ Affects De Paul Ventures – San Jose ASC,  
LLC

**SECURED CREDITORS, AND THE  
COMMITTEE**

Debtors and Debtors in Possession.

(No Hearing Required)

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1 Strategic Global Management, Inc. (“SGM”) respectfully submits this Limited Objection  
2 to the form of the *Order Confirming Modified Second Amended Joint Chapter 11 Plan of*  
3 *Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and the*  
4 *Committee*\_ [Doc. No. 5504] (the “Confirmation Order”), following the lodgment of the proposed  
5 Confirmation Order filed by Verity Health Systems of California, Inc. and its affiliated debtors in  
6 the above-captioned Chapter 11 cases (the “Debtors”) and the other Plan proponents (collectively,  
7 the “Plan Proponents”) by Notice of Lodgment on August 13, 2020 [Doc. No. 5495]:<sup>1</sup>

9  
10 **A. The Confirmation Order Unilaterally Modifies Reservation of Rights Language**  
11 **Agreed Upon Between the Plan Proponents and SGM, in a Manner That**  
12 **Attempts to Prejudice SGM.**

13 Prior to the hearing on confirmation of the Plan,<sup>2</sup> and prior to solicitation of acceptances  
14 of the Plan, SGM and the Plan Proponents agreed on language to be inserted in the Plan and the  
15 Confirmation Order regarding SGM’s dispute of the Debtors’ claim to the \$30 million deposit  
16 (the “Deposit”) posted by SGM pursuant to its sale agreement with the Debtors (the “SGM Sale  
17 Agreement”) The agreed language required the reserve of the Deposit pending resolution of the  
18 dispute by the District Court, and reserved the rights of the parties. This reservation of rights  
19 language was included in the Disclosure Statement, and was to be included in an amended Plan  
20 and the Confirmation Order.<sup>3</sup>

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24 <sup>1</sup> The proposed Confirmation Order was lodged after hours on August 13, 2020, with no advance notice to  
25 SGM and no redline from any prior proposed order. SGM notified the Court’s Clerk that it may have  
26 comments on the lodged order, and was in the process of reviewing the lodged order when the  
27 Confirmation Order was entered at 10:39 a.m. on August 14, 2020.

28 <sup>2</sup> Capitalized but undefined terms herein shall have the same meanings ascribed to them in the SGM’s  
“*Objection . . . To Confirmation Of Second Amended Joint Chapter 11 Plan Of Liquidation*” [Doc. No. 5288]  
(the “SGM Objection”).

<sup>3</sup> See Second Amended Disclosure Statement for Plan, Doc. No. 4994, pp. 43-44.

1 In the agreed upon language included in the Disclosure Statement, the Deposit was  
2 referred to as the “Deposit.” However, in paragraph 17 of the Confirmation Order lodged on  
3 August 13, 2020, the Plan Proponents inserted the word “Nonrefundable” and re-defined the  
4 Deposit as the “Nonrefundable Deposit.” SGM has never agreed to the insertion of the word  
5 “Nonrefundable” in this reservation of rights. This is contrary to the agreed language, the  
6 language used in the final version of the Disclosure Statement and draft confirmation order filed  
7 as an exhibit to the Plan Proponents’ memorandum in support of confirmation [Doc. No. 5385].  
8 It is also an improper attempt to prejudice SGM’s rights, and influence the outcome of the  
9 dispute. As the Plan Proponents are aware, the issue of whether and under what circumstances  
10 the Deposit is “nonrefundable” is being litigated in the District Court. The prejudicial term must  
11 be stricken.  
12

13  
14 **B. The Confirmation Order Does Not Conform to the Court’s Ruling and the**  
15 **Representations of the Plan Proponents.**

16 Based on the Plan Proponents’ own representations, the Court found and ruled that certain  
17 provisions of the Plan, including those involving estimation, setoff and recoupment, did not apply  
18 to SGM, because it did not assert a “Claim” as defined in the Plan.<sup>4</sup>

19 Section 17 (a) of the Confirmation Order contains added language providing that certain  
20 release provisions of the Plan shall not apply to SGM’s Counterclaim pending in the District  
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22  
23  
24 <sup>4</sup> See, *inter alia*, the Court’s tentative and final ruling [Docket No. 5475] (the  
25 “Ruling”), pp. 17 of 43, 25 Of 43, and 26-27 of 43. “SGM’s fear is unfounded and is based upon a  
26 misreading of the Plan. The provision to which SGM objects prohibits “Persons that have held, currently  
27 hold or may hold a Claim against the Debtors” from “asserting any setoff, right of subrogation or  
28 recoupment of any kind, directly or indirectly, against any debt, liability or obligation due to the Debtors,  
the Post-Effective Date Debtors or the Liquidating Trust *with respect to a Claim ....*” (emphasis added).  
As discussed in Section II.A.2, above, the term “Claim” does not encompass the SGM Admin Claim. The  
Plan’s setoff and recoupment provisions will therefore have no effect upon SGM’s ability to defend itself  
in the Adversary Proceeding or prosecute the SGM Counterclaim.”

1 Court Action.<sup>5</sup> However, this language is far more limited in scope than the assertions by the Plan  
2 Proponents adopted by the Court in its ruling. The added language deals only with release  
3 provisions *applicable to release of the Debtors*, and only as to the Counterclaim in the District  
4 Court Action. It does not mention releases of third parties, setoff and recoupment rights, or other  
5 rights which under the Plan are only impacted by provisions applicable to “Holders of Claims” -  
6 which SGM has now been determined not to be as regards the Plan.  
7

8 Section 13.5 (b) of the Plan and Section 15(d)(ii) of the Confirmation Order provide for  
9 release of third parties by Holders of Claims. These sections are not applicable to SGM, and the  
10 Confirmation Order should so state, rather than referring only to other sections. Similarly, the  
11 injunction provisions of Section 13.6 of the Plan and Section 15(e)(i) of the Confirmation Order  
12 prohibiting setoff, recoupment and other rights are not limited to matters in the pending District  
13 Court Action but are limited to holders of Claims. The “No Recourse” provisions of Section 13.8  
14 of the Plan are also limited to “Holders of Allowed Claims.”  
15

16 To more clearly reflect the contentions of the Plan Proponents and the determination of  
17 the Court, and to avoid ambiguity in the Confirmation Order, SGM respectfully submits that the  
18 Confirmation Order should be amended to insert the language in Exhibit A attached hereto and  
19 made a part hereof, in place of the current Section 17 (a).  
20

21 Dated: August 14, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

22 By: /s/ Gary E. Klausner

23 Gary E. Klausner

24 Philip A. Gasteier

25 Jeffrey S. Kwong

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27 <sup>5</sup> See, Confirmation Order at p. 30, lines 10-12. “Further, the Releases of Debtors set forth in Section  
28 15(d)(i) of this Confirmation Order and in Section 13.5(a) of the Plan shall not apply to any counterclaim  
that may be asserted by SGM against the Debtors in the SGM Action, currently pending before the District  
Court.”

Dated: August 14, 2020

BARNES & THORNBURG LLP

By: /s/ Kevin D. Rising

Kevin D. Rising  
L. Rachel Lerman  
Joel R. Meyer

Counsel for Strategic Global Management, Inc.

**EXHIBIT “A”**

## **Exhibit A**

(a) SGM

The following language is included in this Confirmation Order as agreed between the Plan Proponents and SGM:

The Plan Proponents acknowledge that SGM disputes the Debtors' claim to the \$30 million deposit (the "Deposit") posted by SGM pursuant to a sale agreement (the "SGM Sale Agreement"), and SGM contends that the Deposit must be returned to SGM. The Debtors and the Plan Proponents dispute the contentions and claims of SGM to the Deposit, and contend that the Deposit is an asset of the Debtors' estates, free and clear of any rights or claims of SGM, and should be distributed in accordance with the Plan. As provided in the Plan, on the Effective Date, all rights of the Debtors against SGM, including, without limitation, all rights to recover the Deposit, are being transferred to the Liquidating Trust. In addition to the foregoing, on the Effective Date, the Liquidating Trust shall create a reserve of \$15.2 million (the "SGM Reserve"). Notwithstanding any other provision of the Plan or this order: (1) the Liquidating Trust shall not distribute the Deposit or the SGM Reserve to creditors in accordance with the Plan or take any other action which would reduce or dissipate the Deposit or the SGM Reserve, unless permitted by a judgment or an order entered by the District Court having jurisdiction over the adversary proceeding relating to the SGM Sale Agreement (the "Adversary Proceeding"), and such judgment or order has not been stayed. In the event an appeal is taken from any such judgment or order, the party taking the appeal shall have the right to seek a stay pursuant to the applicable Federal Rules of Civil Procedure and Federal Rules of Appellate Procedure. Nothing contained in the Plan or the Disclosure Statement shall modify, alter or change the rights of the



Debtors and the Liquidating Trust, on the one hand, and SGM, on the other hand, to any claim or rights to the Deposit. All such claims and rights are expressly reserved and preserved.

Notwithstanding anything else in the Plan or this Confirmation Order, the release, injunction, exculpation, recourse, and other provisions of the Plan, the Confirmation Order, and any other Plan-related document shall not in any way impair, impact, or otherwise affect SGM's rights, claims, defenses, counterclaims, rights of setoff or recoupment and remedies in connection with the defense of the SGM Claims and the prosecution of SGM's counter-claims in the Adversary Proceeding, or operate to release, limit, or impair any rights and claims of SGM against any person or entity,

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled **LIMITED OBJECTION OF STRATEGIC GLOBAL MANAGEMENT, INC. TO FORM OF ORDER CONFIRMING MODIFIED SECOND AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION (DATED JULY 2, 2020) OF THE DEBTORS, THE PREPETITION SECURED CREDITORS, AND THE COMMITTEE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **August 14, 2020**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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- Rose Zimmerman rzimmerman@dalycity.org

**2. SERVED BY UNITED STATES MAIL:** On **August 14, 2020**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **August 14, 2020**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**Served via Overnight Mail**

The Honorable Ernest M. Robles  
United States Bankruptcy Court  
Edward R. Roybal Federal Building  
255 E. Temple Street, Suite 1560  
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

<b>August 14, 2020</b>	Lisa Masse	/s/ Lisa Masse
<i>Date</i>	<i>Type Name</i>	<i>Signature</i>