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

14 In re
15 VERITY HEALTH SYSTEM OF
16 CALIFORNIA, INC., *et al.*,
17 Debtors and Debtors in Possession.

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

CHAPTER: 11
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

- 18 Affects All Debtors
19 Affects Verity Health System of California,
Inc.
20 Affects O’Connor Hospital
21 Affects Saint Louise Regional Hospital
22 Affects St. Francis Medical Center
23 Affects St. Vincent Medical Center
24 Affects Seton Medical Center
25 Affects O’Connor Hospital Foundation
26 Affects Saint Louise Regional Hospital
Foundation
27 Affects St. Francis Medical Center of
Lynwood Foundation
28 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

**RESPONSE OF STRATEGIC GLOBAL
MANAGEMENT, INC. TO COURT’S
PRELIMINARY FINDINGS AND DEBTOR’S
LIMITED RESPONSE TO ORDER ON
LIMITED OBJECTION TO FORM OF
ORDER CONFIRMING THE MODIFIED
SECOND AMENDED JOINT PLAN**



1 Affects De Paul Ventures – San Jose ASC,
LLC

2 Debtors and Debtors in Possession.

(No Hearing Required)

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1 Strategic Global Management, Inc. (“SGM”) respectfully submits this Response to the
2 “Preliminary Findings” set forth in Exhibit A to the *Order on Strategic Global Management*
3 *Inc.’s Objection to the Form of the Order Confirming the Modified Second Amended Plan* [Doc.
4 No. 5566], and the *Debtors’ Limited Response to Order on Strategic Global Management Inc.’s*
5 *Objection to the Form of the Order Confirming the Modified Second Amended Plan* [Doc. No.
6 6016] (Debtor’s Response”), relating to SGM’s *Limited Objection* [Doc. No. 5506] (“Limited
7 Objection”) to the form of the *Order Confirming Modified Second Amended Joint Chapter 11*
8 *Plan of Liquidating (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and*
9 *the Committee* [Doc. No. 5504] (“Confirmation Order”).¹

10 1. SGM appreciates the Court’s consideration of the Limited Objection. However,
11 SGM disagrees with the Court’s characterization and treatment of the Limited Objection as a
12 motion pursuant to Federal Rule of Bankruptcy Procedure 7052 to amend or make additional
13 findings.

14 The Limited Objection did not request that the Court amend its findings, only that the
15 Confirmation Order be amended to conform to the findings contained in the final ruling of the
16 Court [Doc. No. 5475] (the “Ruling”), which was incorporated in the Confirmation Order. The
17 Limited Objection, while not addressing the accuracy of the findings contained in the Ruling,
18 pointed out that certain aspects of the Confirmation Order relating to SGM did not conform to the
19 Ruling.

20 2. Accordingly, SGM does not agree that the Limited Objection tolls the
21 effectiveness of its notice of appeal pursuant to Bankruptcy Rule 8002(b)(1)(A). SGM reserves
22 all rights in connection with its pending appeal, its pending motion for a limited stay in the
23 District Court, the Ruling, and the Confirmation Order.

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27 ¹ Capitalized but undefined terms herein shall have the same meanings ascribed to them in the SGM’s
28 “*Objection . . . To Confirmation Of Second Amended Joint Chapter 11 Plan Of Liquidating*” [Doc. No.
5288] (the “SGM Objection”).

1 3. SGM does not believe that a separate order implementing changes to the
2 Confirmation Order regarding its Limited Objection, as proposed in the Debtors' Response, is
3 necessary. Such an order is likely only to confuse the situation by creating more ambiguity and
4 the need, potentially, for two appeals. An amended order can be made effective as of August 14,
5 or that date may be retained as the Confirmation Date, so as not upset the Plan Proponents'
6 timetables, or require new mailings. SGM understands that the Plan has not yet gone effective.

7 4. SGM agrees with this Court that the Plan Proponents' use of the terms "Claims"
8 and "Administrative Claims" was misleading and that the Plan needs to be modified to correct
9 that mistake. However, the proposed changes in the Preliminary Findings do not eliminate the
10 ambiguity or conform to the Ruling.

11 Instead of adopting the language proposed by SGM in the Limited Objection, the
12 Preliminary Findings require the Debtors to modify certain language in Section 17 (a) of the
13 Confirmation Order. Because the causes of action asserted by the Debtors in the District Court
14 Action ("SGM Action" as used in the Preliminary Findings) will be assigned to the Liquidating
15 Trustee, who will be prosecuting that action and defending the SGM Counterclaim and
16 Administrative Claim, at a minimum, and without waiving any other issues SGM raised in its
17 Objection, the proposed language should reflect that the Liquidating Trustee will supplant the
18 Debtors in that litigation. SGM requests that, as a minimum, the proposed language be altered as
19 follows (added words underlined):

20 The General Injunction set forth in Section 15(e) of this Confirmation
21 Order and Section 13.6(a) of the Plan shall not apply to (a) SGM's claims and
22 defenses against the Debtors and the Liquidating Trustee in the SGM Action or
23 (b) any counterclaim that may be asserted by SGM against the Debtors and the
24 Liquidating Trustee in the SGM Action.

25 Further, the Releases of Debtors set forth in Section 15(d)(i) of this
26 Confirmation Order and Section 13.5(a) of the Plan shall not apply to (a) any
27 counterclaim that may be asserted by SGM against the Debtors and the
28 Liquidating Trustee in the SGM Action, currently pending before the District

1 Court or to (b) any of SGM’s claims and defenses against the Debtors and the
2 Liquidating Trustee in the SGM Action.

3 5. The Court’s proposed revision to the reservation of rights language in Section 17
4 of the Confirmation Order and the Plan corrects the Debtors’ improper attempt to change SGM’s
5 agreed language from “Deposit” to “Nonrefundable Deposit” (which was originally made part of
6 the Plan and draft confirmation orders until the Debtors unilaterally changed it).

7 However, the Court has declined to modify Section 17 to clarify that the exceptions for
8 SGM’s rights, claims, offsets, and defenses in connection with the District Court Action, extend
9 to the preservation of the right to proceed against others, as SGM requested. SGM reserves all
10 rights and contentions regarding the basis for, and propriety of, the provisions of the Plan and the
11 Confirmation Order (whether as originally stated or as modified) regarding third party releases,
12 injunctions, nonrecourse provisions, offset and recoupment rights and other provisions as
13 referenced in the SGM Objection.

14
15 Dated: September 1, 2020 LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

16 By: /s/ Gary E. Klausner
17 Gary E. Klausner
18 Philip A. Gasteier
19 Jeffrey S. Kwong

20 Dated: September 1, 2020 BARNES & THORNBURG LLP

21 By: /s/ Kevin D. Rising
22 Kevin D. Rising
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26
27
28 Counsel for Strategic Global Management, Inc.

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 **RESPONSE OF STRATEGIC GLOBAL MANAGEMENT, INC. TO COURT'S PRELIMINARY FINDINGS AND DEBTOR'S LIMITED RESPONSE TO ORDER ON LIMITED OBJECTION TO FORM OF ORDER CONFIRMING THE MODIFIED SECOND AMENDED JOINT PLAN** 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 **September 1, 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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1 **2. SERVED BY UNITED STATES MAIL:** On **September 1, 2020**, I served the following persons and/or
2 entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true
3 and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and
4 addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be
5 completed no later than 24 hours after the document is filed.

Service information continued on attached page

6 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR
7 EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR,
8 on **September 1, 2020**, I served the following persons and/or entities by personal delivery, overnight mail
9 service, or (for those who consented in writing to such service method), by facsimile transmission and/or
10 email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight
11 mail to, the judge will be completed no later than 24 hours after the document is filed.

12 **Served via Overnight Mail**

13 The Honorable Ernest M. Robles
14 United States Bankruptcy Court
15 Edward R. Roybal Federal Building
16 255 E. Temple Street, Suite 1560
17 Los Angeles, CA 90012

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

20 September 1, 2020	Lisa Masse	/s/ Lisa Masse
<i>Date</i>	<i>Type Name</i>	<i>Signature</i>

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