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Debtors and Debtors In Possession

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION - LOS ANGELES

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

Case No. 2:20-cv-00613-DSF

Hon. Dale S. Fischer

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,

**NOTICE OF ERRATA TO
PLAINTIFFS' MOTION TO DISMISS
DEFENDANT STRATEGIC GLOBAL
MANAGEMENT'S AMENDED
COUNTERCLAIMS, OR IN THE
ALTERNATIVE, TO STRIKE
PORTIONS OF DEFENDANT
STRATEGIC GLOBAL
MANAGEMENT'S AMENDED
COUNTERCLAIMS AND REQUEST
FOR JUDICIAL NOTICE IN
SUPPORT**

Plaintiffs,

v.

Date: October 5, 2020
Time: 1:30 p.m.
Place: Courtroom 7D
350 West 1st Street
Los Angeles, CA 90012

KALI P. CHAUDHURI, M.D., an
individual, STRATEGIC GLOBAL
MANAGEMENT, INC., a California
corporation, KPC HEALTHCARE
HOLDINGS, INC. a California
Corporation KPC HEALTH PLAN
HOLDINGS, INC. a California
Corporation, KPC HEALTHCARE, INC. a
Nevada Corporation, KPC GLOBAL
MANAGEMENT, LLC, a California



1 Limited Liability Company, and DOES 1
2 through 500,

3 Defendants.

4 STRATEGIC GLOBAL MANAGEMENT,
5 INC., a California corporation,

6 Counter-Plaintiff,

7 v.

8 VERITY HEALTH SYSTEM OF
9 CALIFORNIA, INC., a California
10 nonprofit public benefit corporation, ST.
11 VINCENT MEDICAL CENTER, a
12 California nonprofit public benefit
13 corporation, ST. VINCENT DIALYSIS
14 CENTER, INC., a California nonprofit
15 public benefit corporation, and
16 ST. FRANCIS MEDICAL CENTER, a
17 California nonprofit public benefit
18 corporation, SETON MEDICAL CENTER,
19 a California nonprofit public benefit
20 corporation, and VERITY HOLDINGS,
21 LLC, a California limited liability
22 company,

23 Counter-Defendants.
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1 **TO THE COURT, DEFENDANTS, COUNTER-CLAIMANTS AND**
 2 **THEIR COUNSEL:**

3 **PLEASE TAKE NOTICE** that Plaintiffs Verity Health System of
 4 California, Inc., St. Vincent Medical Center, St. Vincent Dialysis Center, Inc., St.
 5 Francis Medical Center, Seton Medical Center, Verity Holdings, LLC, and the
 6 above-captioned debtors (collectively, the “Debtors” or “Plaintiffs”), hereby correct
 7 *Plaintiffs’ Motion to Dismiss Defendant Strategic Global Management’s Amended*
 8 *Counterclaims, or in the Alternative, to Strike Portions of Defendant Global*
 9 *Management’s Amended Counterclaims* [Docket No. 61] (“Motion to Dismiss”)
 10 and *Plaintiffs’ Request for Judicial Notice in Support of Plaintiffs’ Motion to*
 11 *Dismiss Defendant Strategic Global Management’s Amended Counterclaims, or in*
 12 *the Alternative, to Strike Portions of Defendant Strategic Global Management’s*
 13 *Amended Counterclaims* [Docket No. 62] (“Request for Judicial Notice”), which
 14 inadvertently omitted Exhibit “T,” the November 20, 2019 letter from Plaintiffs’
 15 counsel to SGM.

16 The November 20, 2019 letter is cited on page, lines 7-24; page 20, line 24;
 17 page 21, lines 5-26; and page 22 line 7 of the Motion to Dismiss.

18 “Plaintiffs’ RJN, Ex. T” should be added in the Motion to Dismiss at:

- 19 • Page 9, line 24 before “Counterclaim, ¶¶ 45-47.”
- 20 • Page 20, line 25 before “Counterclaim ¶¶ 46-47.”
- 21 • Page 21, line 13 before “Accordingly, the letter ...”
- 22 • Page 21, line 26 after “November 18, 2019 Order, quoted above.”

23 Filed concurrently with this Notice is *Plaintiffs’ Corrected Request for*
 24 *Judicial Notice in Support of Plaintiffs’ Motion to Dismiss Defendant Strategic*
 25 *Global Management’s Amended Counterclaims, or in the Alternative, to Strike*
 26 *Portions of Defendant Strategic Global Management’s Amended Counterclaims*
 27 with Exhibits “A” - “T” attached.
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Dated: September 4, 2020

Respectfully submitted,

DENTONS US LLP
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SONIA R. MARTIN
TANIA M. MOYRON
NICHOLAS A. KOFFROTH

By /s/ Sonia R. Martin
Sonia R. Martin

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California, Inc., *et al.*

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