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9 Debtors In Possession

10 **UNITED STATES BANKRUPTCY COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA -**
12 **LOS ANGELES DIVISION**

12 In re
13 VERITY HEALTH SYSTEM OF
14 CALIFORNIA, INC., *et al.*,
Debtors and Debtors In Possession.

- 15 Affects All Debtors
- 16 Affects Verity Health System of California, Inc.
- 17 Affects O'Connor Hospital
- 18 Affects Saint Louise Regional Hospital
- 19 Affects St. Francis Medical Center
- 20 Affects St. Vincent Medical Center
- 21 Affects Seton Medical Center
- 22 Affects O'Connor Hospital Foundation
- 23 Affects Saint Louise Regional Hospital
Foundation
- 24 Affects St. Francis Medical Center of Lynwood
Foundation
- 25 Affects St. Vincent Foundation
- 26 Affects St. Vincent Dialysis Center, Inc.
- 27 Affects Seton Medical Center Foundation
- 28 Affects Verity Business Services
- Affects Verity Medical Foundation
- Affects Verity Holdings, LLC
- Affects De Paul Ventures, LLC
- Affects De Paul Ventures - San Jose ASC, LLC

Debtors and Debtors In Possession.

Lead Bankruptcy 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

Chapter 11 Cases
Hon. Judge Ernest M. Robles
Adversary No. 2:20-ap-01051-ER

**STIPULATION TO DISMISS ADVERSARY
PROCEEDING WITH PREJUDICE**

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CALIFORNIA NURSES ASSOCIATION
(CNA)

Plaintiff,

v.

VERITY HEALTH SYSTEMS OF
CALIFORNIA, INC., a California Corporation;
ST. FRANCIS MEDICAL CENTER, an
Affiliate; ST. VINCENT MEDICAL CENTER, an
Affiliate; SETON MEDICAL CENTER, an
Affiliate; ST. FRANCIS MEDICAL CENTER
OF LYNWOOD, an Affiliate; ST. VINCENT
DIALYSIS CENTER, INC., an Affiliate;
VERITY HOLDINGS, LLC, an Affiliate;
DEPAUL VENTURES, LLC, an Affiliate;
RICHARD ADCOCK, an Individual; STEVEN
SHARRER, an Individual, and DOES 1 through
500,

Defendants.

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STIPULATION

Defendants Verity Health System of California, Inc., Seton Medical Center, St. Vincent Medical Center, St. Vincent Dialysis Center, Inc., St. Francis Medical Center, Verity Holdings, LLC and DePaul Ventures, LLC (collectively, the “Institutional Defendants”), Defendants Richard Adcock and Steven Sharrer (the “Individual Defendants,” and referred to with the Institutional Defendants as the (“Defendants” and individually as “Defendant”), and Plaintiff California Nurses Association (“Plaintiff” or “CNA,” and referred collectively with the Defendants as the “Parties”), hereby enter into this Stipulation (the “Stipulation”) based on the following recitals of fact:

RECITALS

A. On March 5, 2020, Plaintiff CNA filed its *Complaint For Damages, Civil Penalties, Attorneys Fees* [Docket No. 1] (the “Complaint”), which initiated the above-captioned adversary proceeding (the “Adversary Proceeding”).

B. On September 17, 2020, the Court entered the *Order Granting Debtors’ Motion to Approve Settlement Between Debtors and California Nurses Association (CNA)* [Docket No. 6084] (the “Settlement Order”), which granted the Institutional Defendants’ motion [Docket No. 5508] (the “Settlement Motion”) for approval of a settlement agreement (the “Settlement Agreement”) by and between Plaintiff, CNA, and the Defendants.

C. The Settlement Agreement provides, among other things that, upon entry of the Settlement Order, “or as soon as reasonably practicable thereafter, the Parties will file a stipulation dismissing the Adversary Proceeding with prejudice.” *See* Settlement Mot., Ex. 1 at 3.

AGREEMENT

NOW, THEREFORE, the Parties to this Stipulation hereby agree and stipulate that the Adversary Proceeding shall be dismissed with prejudice, pursuant to the Settlement Agreement and Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure (as made applicable to this Adversary Proceeding, pursuant to Rule 7041 of the Federal Rules of Bankruptcy Procedure).

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Dated: October 1, 2020

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By: /s/ Tania M. Moyron
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Dated: October 1, 2020

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LOUISE ANN FERNANDEZ

By: _____
Louise Ann Fernandez

Counsel for Richard Adcock and Steven
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Dated: October 1, 2020

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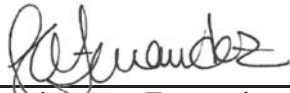
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