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Debtors and Debtors In Possession

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re

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

Debtor and Debtor In  
Possession.

☒ 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

☐ Affects De Paul Ventures - San Jose  
Dialysis, LLC

Debtors and Debtors In Possession.

Lead 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

**FINAL APPLICATION OF DENTONS US LLP,  
AS DEBTORS' COUNSEL, FOR FEES AND  
EXPENSE REIMBURSEMENT, INCLUDING  
FOR THE PERIOD MAY 1, 2020 THROUGH  
SEPTEMBER 4, 2020; DECLARATION OF  
JOHN A. MOE, II**

Date: December 16, 2020

Time: 10:00 a.m.

Place: Courtroom 1568

Royal Federal Building

255 East Temple Street

Los Angeles, California 90012

DENTONS US LLP  
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**TABLE OF CONTENTS**

	<b>Page</b>
I. INTRODUCTION .....	1
A. Overview of Services August 31, 2018 - September 4, 2020 .....	1
B. The Sixth Interim Period.....	4
II. DETAILED REVIEW OF COMPENSATION REQUEST .....	5
A. Dentons' Appointment as Counsel to the Debtors.....	5
B. Previously Paid Compensations from August 31, 2018 through April 30, 2020.....	5
C. Fees and Reimbursement of Expenses Sought for the Period May 1, 2020 through September 4, 2020 .....	6
D. Summary of Hours and Fees .....	7
E. Professionals and Hourly Rates .....	8
F. Project Billing .....	8
G. Guidelines Pursuant to which this Final Interim Application Has Been Prepared.....	10
III. REVIEW AND CERTIFICATION .....	11
A. Client Review.....	11
B. Certification of Counsel .....	11
IV. DESCRIPTION OF SERVICES MAY 1, 2020 - SEPTEMBER 4, 2020 .....	12
A. Closing the Sale of Seton .....	12
B. Closing the Sale of St. Francis .....	15
C. The Adversary Proceeding Commenced by the California Nurses Association.....	17
D. The Assumption and Assignment, or Rejection, of Contracts and Leases Related to St. Francis, St. Vincent and Seton .....	19
E. Confirmation of the Plan.....	20
F. Cash Collateral, Secured Creditors and Bondholders .....	23
G. Prosecuting Litigation Against SGM and Other Defendants, Including the Adversary Proceeding and Defending Appeals .....	27
H. Employee-Related Matters.....	31

1	1.	Employee-Related Matters In Connection With Sales of Seton .....	32
2	2.	Employee-Related Matters in Connection with Sale of St. Francis.....	32
3	3.	Hiring of Employees Needed on a Temporary Basis and Employee Wind Down Matters .....	33
4	4.	Termination of Corporate Employees .....	33
5	I.	Monitoring Cases Pending Outside the Bankruptcy Court.....	33
6	J.	Preparation and Review of Professionals’ Monthly and Interim Fee Applications .....	35
7			
8	1.	Preparation and Entry of Order on Dentons’ Fourth Interim Application .....	35
9			
10	2.	Review of Other Professionals’ Fee Applications .....	35
11	3.	Dentons’ Monthly Fee Statements .....	36
12	V.	COSTS AND SUMMARY OF EXPENSES .....	37
13	VI.	LEGAL ARGUMENT .....	37
14	VII.	CONCLUSION .....	40

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# TABLE OF AUTHORITIES

Page(s)

## Cases

<i>Blanchard v. Bergeron</i> , 489 U.S. 87 (1989).....	38
<i>Blum v. Stenson</i> , 465 U.S. 886 (1984).....	38
<i>In re Charles Russell Buckridge</i> , 367 B.R. 191 (C.D.Cal. 2007).....	38
<i>Dang v. Cross</i> , 422 F.3d 800 (9th Cir. 2005).....	39
<i>Hensley v. Eckerhart</i> , 461 U.S. 424 (1983).....	38
<i>Johnson v. Georgia Highway Express, Inc.</i> , 488 F.2d 714 (5th Cir. 1974).....	38
<i>Kerr v. Screen Extras Guild, Inc.</i> , 526 F.2d 67 (9th Cir. 1975), <i>cert. denied</i> , 425 U.S. 951 (1976).....	38
<i>In re Manoa Finance Co., Inc.</i> , 853 F.2d 687 (9th Cir. 1988).....	37
<i>Meronk v. Arter &amp; Hadden, LLP (In re Meronk)</i> , 249 B.R. 208 (B.A.P. 9th Cir. 2000).....	38
<i>Pennsylvania v. Del. Valley Citizens' Council for Clean Air</i> , 478 U.S. 546 (1986).....	38
<i>Unsecured Creditors' Comm. v. Puget Sound Plywood, Inc.</i> , 924 F.2d 955 (9th Cir. 1991).....	39

## Statutes

Civil Rights Act, 42 U.S.C. § 1983.....	38
Clean Air Act, 42 U.S.C. § 7401, <i>et seq.</i> .....	38



I.

INTRODUCTION

Dentons US LLP (“Dentons” or the “Firm”) was counsel to Verity Health System of California, Inc. (“VHS” or “Verity”), a California nonprofit public benefit corporation, and the above-captioned sixteen affiliated entities, debtors and debtors in possession (the “Debtors”), in the above-captioned jointly administered chapter 11 cases (the “Cases”), and now is counsel to the post effective date Debtors and special counsel to the Liquidating Trustee.

This *Final Application Of Dentons US LLP, As Debtors’ Counsel, For Fees And Expense Reimbursement, Including For The Period May 1, 2020 Through September 4, 2020* (the “Final Application”) covers the most recent four months of Dentons’ work, but also presents an overview of work previously performed, so as to cover the entire period from the petition date of August 31, 2018, through September 4, 2020.

For the period May 1, 2020, through September 4, 2020 (the “Sixth Interim Period”), Dentons seeks an award of \$3,278,649.87 in fees and \$86,426.34 in expenses, a total of \$4,184,749.93, which includes a reduction of \$212,965<sup>1</sup> for the period August 1, 2020, through September 4, 2020.

For the period August 31, 2018, through April 30, 2020, Dentons requests the Court to affirm its prior awards of fees totaling \$17,934,607.27 and expenses of \$304,763.28.

**A. Overview of Services August 31, 2018 - September 4, 2020**

As set forth in detail in the five previous interim fee applications filed on behalf of Dentons, which the Court has reviewed and approved, and on which orders have been entered, Dentons served as lead bankruptcy counsel to the Debtors in the second largest nonprofit hospital bankruptcy case in United States history, from before the date the Debtors filed their voluntary petitions, through the date that this Final Application is filed. The Debtors included five California nonprofit public benefit corporations that operated six acute care hospitals, O’Connor Hospital (“O’Connor”),

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<sup>1</sup> The amount reflects a fee reduction of \$12,965.00 to review and revise Dentons’ billing statements plus an additional “across the board” fee reduction of \$200,000, totaling \$212,965.00 for the last monthly period.

1 Saint Louise Regional Hospital (“Saint Louise”), St. Francis, St. Vincent and Seton (collectively,  
2 the “Hospitals”) and other facilities in the state of California. The parent company, Verity, the  
3 Hospitals and their affiliated entities (collectively, “Verity Health System”) operated as a nonprofit  
4 health care system in the state of California. The scope of the services provided by the Verity  
5 Health System was exemplified by the fact that in 2017, the Hospitals provided medical services to  
6 over 50,000 inpatients and approximately 480,000 outpatients. Dentons provided superior legal  
7 advice to the Debtors and achieved numerous positive resolutions and rulings on issues central to  
8 the successful resolution of the Debtors’ cases, including complex issues of first impression.

9 Upon filing the Debtors’ cases, Dentons successfully obtained “first day” relief that allowed  
10 the Debtors’ to continue postpetition operations and preserve value, including orders authorizing  
11 the Debtors’ use of cash collateral and debtor-in-possession financing, payment of wages and other  
12 prepetition obligations to employees. Additionally, Dentons devised the strategy and, at the  
13 direction of the Debtors, implemented the rejection of a management contract required by the  
14 California Attorney General that had burdened the Debtors with tens of millions of dollars of  
15 unnecessary liabilities.

16 Dentons worked with the Debtors and BRG preparing, then filing extensive *Schedules* and  
17 *Statements of Financial Affairs* for each of the seventeen Debtors.

18 Throughout the case, Dentons interfaced continually with creditors and parties-in-interest,  
19 responded to and filed numerous motions, as appropriate, and monitored and as necessary, filed  
20 pleadings, in over 200 cases consisting of court cases and claims asserted outside the bankruptcy  
21 case.

22 Dentons successfully guided the Debtors through the sales of the Hospitals. Dentons first  
23 successfully advised the Debtors through the process of selling O’Connor and Saint Louise to the  
24 County of Santa Clara, which, among other things, required that Dentons overcome vigorous  
25 opposition from the California Attorney General on legal issues of first impression.

26 Dentons then worked closely with the Debtors, the Debtors’ financial advisors, Berkeley  
27 Research Group LLC (“BRG”), the Debtors’ investment banker, Cain Brothers, a Division of  
28 KeyBanc Capital Markets (“Cain”) and the Official Committee of Unsecured Creditors (the

1 “Committee”) to secure a bid for more than \$600 million for the remaining Hospitals from SGM.  
2 Dentons worked tirelessly, for nearly a year, to satisfy all conditions to closing, including creating  
3 innovating arguments on cutting edge legal issues to successfully obtain an order to sell free and  
4 clear of “additional conditions” imposed by the Attorney General and resolve objections to the  
5 transfer of the Medicare and Medi-Cal provider agreements.

6 After the SGM sale did not close, Dentons successfully obtained approval to pursue  
7 alternative sales processes and guided the Debtors through successful sales of the remaining  
8 Hospitals. First, Dentons guided the Debtors through the difficult, but necessary, process of closing  
9 St. Vincent. As the COVID-19 pandemic began to affect the communities served by the Hospitals,  
10 Dentons successfully negotiated and obtained approval of two agreements with the State of  
11 California concerning its efforts to address the pandemic: (i) a lease for certain property located on  
12 the St. Vincent campus for monthly payments of \$2.6 million; and (ii) a services agreement  
13 concerning the delivery of healthcare services at certain designated space located at the Seton  
14 hospital located in Daly City, California, for monthly payments of up to \$5 million. Dentons then  
15 successfully and simultaneously spearheaded three expedited sales processes for St. Francis and  
16 Seton, as operating hospitals, and St. Vincent, as a closed facility. The St. Francis sale process  
17 again required Dentons to litigate with the Attorney General, including issues of first impression  
18 related to the interaction of the Bankruptcy Code provisions dealing with the sale of nonprofits and  
19 § 363. Additionally, in connection with the sales, Dentons represented the Debtors in labor  
20 negotiations and in rejecting collective bargaining agreements under § 1113. Ultimately, Dentons’  
21 efforts to successfully sell all of the Debtors’ Hospitals resulted in a net benefit to the Debtors’  
22 estates of approximately \$800 million.

23 Contemporaneous with the sale processes, Dentons also successfully negotiated the Plan  
24 with the Debtors’ numerous secured creditors and the Committee. The negotiations resulted in a  
25 “Plan Settlement” that included, among other things, an agreement by one secured creditor to defer  
26 payment of a portion of its secured claim to ensure that the estates could satisfy administrative  
27 expenses that were required to be paid on the plan effective date. The Debtors also obtained  
28 settlements with other major constituents, including the Pension Benefit Guaranty Corporation (the

1 “PBGC”). The Plan garnered overwhelming support from each class entitled to vote on  
2 confirmation of the Plan, which was successfully approved by the Court and is now effective.

3 Dentons’ representation of the Debtors resulted in substantial benefits to the Debtors’  
4 estates and the successful resolution of the Debtors’ complex chapter 11 cases.

5 **B. The Sixth Interim Period**

6 During the Sixth Interim Period: Dentons continued to work closely with the Debtors in all  
7 aspects of its Cases, which required specialized services since the Debtors operated acute care  
8 hospitals and related businesses. During the Sixth Interim Period, Dentons rendered services on  
9 significant matters, including, but not limited to: (i) closing the sale of Seton Medical Center and  
10 Seton Medical Center Coastsides (collectively “Seton”) and handling related matters; (ii) closing the  
11 sale of St. Francis Medical Center (“St. Francis”) and handling related matters; (iii) defending and  
12 resolving in mediation the adversary proceeding commenced by the California Nurses Association;  
13 (iv) the assumption, assignment or rejection of executory contracts and unexpired leases related to  
14 the sales of St. Francis, St. Vincent Medical Center (“St. Vincent”) and Seton (v) confirmation of  
15 the *Modified Second Amended Joint Chapter 11 Plan of Liquidation (dated July 2, 2020) filed by*  
16 *the Debtors, the Prepetition Secured Creditors and the Committee* (the “Plan”); (vi) addressing  
17 cash collateral matters; (vii) prosecuting litigation against Strategic Global Management, Inc.  
18 (“SGM”), and other defendants, including the adversary proceeding and appeals; (viii) addressing  
19 employee-related matters and issues; (ix) monitoring state court cases; and, (x) preparing and  
20 reviewing professionals’ monthly and interim fee applications.

21 As demonstrated herein, and as demonstrated in Dentons’ five previously filed interim fee  
22 applications, the accumulated skill and background of the Dentons’ partners, counsel, associates  
23 and paraprofessionals have worked to the advantage of the Debtors and their estates.

24 Based on the work performed, Dentons respectfully requests that the Court affirm the  
25 previous awards of fees and expenses for the period August 31, 2018 through April 30, 2020. as a  
26 final award; and, approve fees and expenses requested in this Final Application for the Sixth Interim  
27 Period, also as a final award.  
28

II.

DETAILED REVIEW OF COMPENSATION REQUEST

A. **Dentons' Appointment as Counsel to the Debtors**

On September 28, 2018, Dentons filed *Debtors' Application to Employ Dentons US LLP as Its Bankruptcy Counsel Nunc Pro Tunc to the Petition Date* [Docket No. 345] ("Employment Application"). On October 30, 2018, the Court entered its *Order Approving Application to Employ Dentons US LLP as Bankruptcy Counsel Nunc Pro Tunc to the Petition Date* [Docket No. 712] ("Employment Order"), authorizing Dentons' employment as of August 31, 2018.

B. **Previously Paid Compensations from August 31, 2018 through April 30, 2020**

The Court awarded Dentons total fees and expenses of \$4,206,451.30 (\$4,114,913.59 in fees and \$91,537.71 in expenses) on the *First Interim Application of Dentons US LLP as Debtors' Counsel, for the Period August 31, 2018 through December 31, 2018* [Docket No. 1799; order entered April 9, 2019, Docket No. 2103] (the "First Interim Application").

The Court awarded Dentons total fees and expenses of \$3,357,876.21 (\$3,314,249.88 in fees and \$43,626.33 in expenses) on the *Second Interim Application of Dentons US LLP as Debtors' Counsel, for the Period January 1, 2019 through April 30, 2019* [Docket No. 2776; order entered August 19, 2019, Docket No. 2924] (the "Second Interim Application").

The Court awarded Dentons total fees and expenses of \$3,181,941.47 (\$3,149,146.82 in fees and \$32,794.65 in expenses) on the *Third Interim Application of Dentons US LLP as Debtors' Counsel, for the Period May 1, 2019 through September 30, 2019* [Docket No. 3520; order entered November 20, 2019, Docket No. 3648] (the "Third Interim Application").

The Court awarded Dentons total fees and expenses of \$3,375,438.95 (\$3,313,929.48 in fees and \$61,509.47 in expenses) on the *Fourth Interim Application of Dentons US LLP as Debtors' Counsel, for the Period October 1, 2019 through December 31, 2019* [Docket No. 4250; order entered April 2, 2020, Docket No. 4401] (the "Fourth Interim Application").

The Court awarded Dentons total fees and expenses of \$417,662.62 (\$4,042,367.50 in fees and \$75,295.12 in expenses) on the *Fifth Interim Application of Dentons US LLP as Debtors'*

*Counsel, for the Period January 1, 2019 through April 30, 2019* [Docket No. 5071; order entered August 12, 2020, Docket No. 5483] (the “Fifth Interim Application”).

In summary, for the period August 31, 2018, through April 30, 2020, the fees and expenses awarded Dentons were as follows:

**August 31, 2020 - April 30, 2020**

<u>Periods</u>	<u>Fees</u>	<u>Expenses</u>
First Interim	\$4,114,913.59	\$91,537.71
Second Interim	\$3,314,249.88	\$43,626.33
Third Interim	\$3,149,146.82	\$32,794.65
Fourth Interim	\$3,313,929.48	\$61,509.47
Fifth Interim	\$4,042,367.50	\$75,295.12
<b>Total</b>	<b>\$17,934,607.27</b>	<b>\$304,763.28</b>

Dentons requests the Court affirm as a final award the previous awards of fees and expenses for the period August 31, 2018 through April 30, 2020, totaling \$17,931,607.27 in fees and \$304,763.28 in expenses.

**C. Fees and Reimbursement of Expenses Sought for the Period May 1, 2020 through September 4, 2020**

In regard to the Sixth Interim Period, Dentons seeks an order from this Court: (1) allowing compensation for services rendered and expenses in the total amount of \$4,184,749.93 comprising fees of \$3,278,649.87<sup>2</sup> and expenses of \$86,426.34 of which \$2,273,323.77 has been paid, and of which \$1,911,426.16 remains due, in accordance with *Monthly Fee Applications* [Docket Nos. 5187, 6067, 6069 and 6185] filed by Dentons in accordance with this Court’s *Order on Debtors’ Motion Establishing Procedures for Monthly Payment of Fees and Expense Reimbursement* (the “Fee Procedures Order”) [Docket No. 661]; and (2) allowing payment of the balance due Dentons for the Sixth Interim Period of \$1,911.426.16.

More specifically, the amount of fees sought, paid and remaining due Dentons in accordance with Dentons’ final *Monthly Fee Applications* are as follows:

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<sup>2</sup> This amount reflects fee reductions of \$238,784.00 comprised of \$38,784.00 for preparation of Dentons’ monthly billing statements plus an additional fee reduction of \$200,000.00 totaling \$238,784.00.

**Breakdown of Amounts Paid and Remaining Amounts Owed**

<u>Application Period</u> May 1, 2020 – September 4, 2020	<u>Total Paid to Dentons</u> 80% Fees / 100% Costs	<u>20% Holdback Owed &amp;</u> <u>100% Fees/Costs for</u> <u>Aug-Sept 4th</u>
Twenty-First Monthly Fee Application (May 2020)	\$621,797.11	\$150,941.80
Twenty-Second Monthly Fee Application (June 2020)	\$994,908.21	\$157,743.91
Twenty-Third Monthly Fee Application (July 2020)	\$656,618.45	\$243,932.05
Twenty-Fourth Monthly Fee Application (August/Sept. 4th 2020)	\$0.00	\$1,358,808.40
	<b>\$2,273,323.77</b>	<b>\$1,911,426.16</b>

Dentons has reduced its fees for the Sixth Interim Period, as appropriate, and/or in accordance with Dentons' agreement with the Debtors, including:

- Because the Debtors are nonprofit institutions serving a charitable mission, Dentons capped all attorneys' hourly rates at \$800 per hour and provided a 15% discount on all standard hourly billing rates for attorneys whose hourly rates are less than \$800, no matter the standard rate for the timekeeper, resulting in a fee reduction of more than \$1,000,000;
- Dentons eliminated \$38,784.00 in fees incurred in preparing Dentons' monthly statements; and,
- Dentons previously reduced the Twenty-Fourth Monthly Fee Application by an a total of \$212,965.00.

**D. Summary of Hours and Fees**

The following fees have been incurred in the Debtors' cases:

**Summary of Hours and Fees for Each Debtor**  
**May 1, 2020 – September 4, 2020**

<b>Debtor</b>	<b>Hours</b>	<b>Fees</b>
Verity Health System California, Inc.	3450.90	\$2,010,113.21
O'Connor Hospital	15.20	\$8,104.97
St. Vincent Medical Center	64.40	\$33,953.31

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Debtor	Hours	Fees
St. Francis Medical Center	1760.30	\$1,011,602.10
Saint Louise Regional Hospital	.10	\$41.65
Seton Medical Center/Seton Coastside	590.50	\$325,741.42
Verity Business Services	5.90	\$2,194.70
Seton Medical Center Foundation	3.80	\$2,618.44
St. Vincent Medical Center Foundation	1.40	\$692.75
Verity Medical Foundation	31.40	\$19,390.70
Verity Holdings, LLC	72.30	\$44,914.17
DePaul Ventures, LLC	3.70	1,250.35
DePaul Ventures - San Jose Dialysis, LLC	7.70	\$4,118.05
Verity Health v. SGM	991.00	\$564,098.65
CNA v. Verity	502.60	\$241,807.71
<b>Sub-total</b>	<b>7498.20</b>	<b>\$4,337,107.59</b>
<b>Fee Reductions</b>		<b>(\$238,784.00)</b>
<b>TOTAL</b>	<b>7498.20</b>	<b>\$4,098,323.59</b>

#### **E. Professionals and Hourly Rates**

The names of all of the attorneys and paraprofessionals who have been responsible for providing services to the Debtors during this Sixth Interim Period, the year admitted to practice for each attorney, their rate, total number of hours spent on the case and total fees charged as a result of service they each provided to the Debtors, is attached hereto as Exhibit “A.”

In general, tasks were allocated among the professionals and paraprofessionals based upon their comparative expertise, taking into consideration the knowledge and experience of Dentons’ professionals and paraprofessionals. Dentons represented the Debtors as effectively and efficiently as possible during the Sixth Interim Period.

Resumes on the background and qualifications of each of the attorneys who rendered services to the Debtors during the Sixth Interim Period are attached collectively hereto as Exhibit “B.”

#### **F. Project Billing**

In accordance with the Central District Guidelines and UST Guidelines, Dentons classified all services performed for each of the 17 Debtors, into 33 Categories Of Service (“Task Codes”).



Dentons attempted to place the services performed in the appropriate Task Code that best related to the service provided. Dentons has attached as Exhibit “C” a Chart *for each Debtor*, specifying the hours and fees incurred by each Task Code.

During the course of Dentons’ representation of the Debtors during the Sixth Interim Period, Dentons performed the services described in this Final Interim Application and the time and descriptions of services, attached as Exhibits “D,” “E,” “F” and “G.” However, *because certain services may relate to one or more Task Codes, services arguably pertaining to one Task Code may, in fact, be included in another Task Code.*

More specifically, Dentons has categorized the services performed for the seventeen Debtors during the Sixth Interim Period into the following thirty-three (33) separate Task Codes.

Task Code	Description of Task Code
AGI	Attorney General Issues
B100	Administration (Pro Hac Vice Apps, Critical Dates Memos; “all-hands” conference calls; Requests for Notice; and Master Lists)
B110	Case Administration (including PCO; Schedules and SOFA)
B120	Asset Analysis and Recovery
B130	Asset Disposition (including work on Asset Purchase Agreements)
B140	Relief from Stay/Adequate Protection Proceedings (including automatic stay issues, stay violations)
B150	Meetings of and Communications with Creditors (including Formation of the UCC; 341(a) Meeting; Committee calls)
B160	Fee Applications/Employment Applications (including Billing Issues); Budgeting
B170	Fee Objections/Employment Objections
B180	Avoidance Action Analysis
B185	Assumption/Rejection of Leases and Contracts (including St. Vincent’s IPA, SOAR, Hunt, physician agreements)
B190	Other Contested Matters (excluding Assumption/Rejection Motions; First day Motions; Notices of Stay)
B195	Non-Working Travel
B200	Operations (Licenses, Beds; Patient Records; Patient Refunds; Physicians Billing; Delta Dental)

Task Code	Description of Task Code
B210	Business Operations (including Critical Vendors, Credit card issues; Reclamation Claims; Mechanics Liens; Cash Management Motion; Patient Refund Motion; Managed Care Issues)
B220	Employee Pension & Profit Sharing Plans/Defined Benefit Plans/401k Plans (and any other retirement plans)
B230	Financing/Cash Collateral (including Meetings with Prepetition Lenders; negotiating DIP Financing; Bond Issues)
B240	Tax Issues
B250	Real Estate
B260	Board of Directors Matters
B300	Claims and Plan
B310	Claims Administration and Objections (including Mechanics Liens; PACA)
B320	Plan and Disclosure Statement
B400	Bankruptcy-Related Advice (Work Product Analysis)
B410	General Bankruptcy Advice/Opinions
B420	Restructurings
INS	Insurance (including Workers Compensation Claims, Marillac, Old Republic, D&O Insurance)
MED/CMS	Medicare/CMS Issues
MED/DHC	Medi-Cal/DHCS Issues
REP	Reporting (MORs)
VAL	Valuation
EMP	Employee related issues (including employment, union contracts, wages, WARN Act Notices, severance, payroll issues; insider compensation; KERP & KIEP; Union issues)
APP	Appellate Work

Not all the task codes were utilized during the Sixth Interim Period.

**G. Guidelines Pursuant to which this Final Interim Application Has Been Prepared**

Dentons submits this Final Application in accordance with the Employment Order, the Fee Procedures Order, the Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees issued by the United States Bankruptcy Court for the Central District of California (“Central District Guidelines”), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 331 (“UST

1 Guidelines”) and the Local Bankruptcy Rules of the United States Bankruptcy Court for the Central  
2 District of California (“LBR”).

3 **III.**

4 **REVIEW AND CERTIFICATION**

5 **A. Client Review**

6 Dentons has previously provided the Debtors with copies of Dentons’ four *Monthly Fee*  
7 *Applications* for the Sixth Interim Period, and is providing a copy of this Final Application to the  
8 Debtors.

9 **B. Certification of Counsel**

10 The undersigned counsel, on behalf of Dentons, certifies that, in accordance with the  
11 concurrently filed *Declaration of John A. Moe, II*:

- 12 • Mr. Moe has read this Final Application;
- 13 • The compensation and expense reimbursement requested are billed at rates, in  
14 accordance with practices, no less favorable than those customarily employed by  
15 Dentons and generally accepted by Dentons’ clients;
- 16 • At all relevant times, Dentons has been a disinterested person as that term is defined  
17 in § 101(14)<sup>3</sup> and has not represented or held an interest adverse to the interest of  
18 the Debtors.
- 19 • Neither Dentons nor any members of Dentons has any agreement or understanding  
20 of any kind or nature to divide, pay over or share any portion of the fees or expenses  
21 to be awarded to Dentons with any other person or attorney except as among the  
22 members and associates of Dentons;
- 23 • To the best of the knowledge, information and belief of Mr. Moe, formed after  
24 reasonable inquiry, no time has been billed to the Debtors outside the scope of work  
25 authorized by the Order authorizing employment of the Firm; and

26 \_\_\_\_\_  
27 <sup>3</sup> All references to “section” (or “sections”) or “§ “ (or “§§”) are to sections of the United States  
28 Bankruptcy Code, 11 U.S. § 101-1532. All references to “Bankruptcy Rule” are to the Federal  
Rules of Bankruptcy Procedure. All references to “LBR” are to the Local Bankruptcy Rules of the  
United States Bankruptcy Court of the Central District of California.

- To the best of the knowledge information and belief of Mr. Moe, formed after reasonable inquiry, the compensation and expense reimbursement sought herein is in conformity with the LBR, the Compensation Guidelines for the United States Bankruptcy Court for the Central District of California and the Guidelines of the Office of the United States Trustee, except as otherwise noted herein.

**IV.**

**DESCRIPTION OF SERVICES**

**MAY 1, 2020 - SEPTEMBER 4, 2020**

Dentons has identified and will describe ten key services provided by Dentons during the Sixth Interim Period, and the attached Monthly Statements explain in detail all the work performed by Dentons during that time:

1. Closing the sale of Seton and related matters.
2. Closing the sale of St. Francis and related matters.
3. Defending and resolving the adversary proceeding commenced by the California Nurses Association.
4. The assumption and assignment, or rejection of executory contracts and unexpired leases related to the newly approved sales of St. Francis, St. Vincent and Seton.
5. Confirmation of the Plan.
6. Addressing cash collateral matters.
7. Prosecuting litigation against SGM and other defendants, including the adversary proceeding and defending appeals.
8. Addressing employee-related matters and issues.
9. Monitoring cases pending outside the Bankruptcy Court.
10. The preparation and review of professionals' monthly and interim fee applications.

More specifically, the work performed by Dentons during the Sixth Interim Period included the following.

**A. Closing the Sale of Seton and Related Matters**

The Firm has been instrumental in the Debtors' successful efforts to close the sale (the "Seton Sale") of Seton to AHMC Healthcare Inc. ("AHMC"), pursuant to the order [Docket No.

1 4634] (the “Seton Sale Order”) authorizing the Seton Sale. As set forth more fully below, during  
2 the Sixth Interim Period, the Firm’s attorneys were actively involved in discussions with the  
3 Debtors’ management, BRG, Cain, AHMC, the Committee, the prepetition secured creditors and a  
4 wide array of other stakeholders focused on satisfying all conditions to closing the Seton Sale. The  
5 Firm’s attorneys involved throughout this process included not only bankruptcy counsel, but also  
6 mergers and acquisition, corporate, labor and employment, insurance and financing experts.

7 During this period, and as discussed below, the Firm’s attorneys also worked closely with  
8 the Debtors’ accounting staff and financial advisors to address executory agreements related to  
9 Seton. The Firm’s attorneys work with counterparties to thousands of contracts which are subject  
10 to assumption and assignment in the Seton Sale over terms and conditions as well as cure amounts.

11 The Firm’s attorneys also took the lead on (i) negotiating the terms of the transfer of the  
12 Medicare provider agreement with AHMC’s attorneys (both in-house and external), and counsel to  
13 Health & Human Services (“HHS”), and (ii) negotiating the terms of the transfer of the Medi-Cal  
14 provider agreement with AHMC’s attorneys (both in-house and external) and counsel to the  
15 Department of Health Care Services (“DHCS”). The negotiations resulted in the successful  
16 approval of stipulations approving the transfer of both Medicare and Medi-Cal provider agreements  
17 from Seton to AHMC in connection with the Seton Sale. *See* Docket Nos. 5336, 5349, 5491, 5491.

18 The Firm’s attorneys also handled multiple significant matters related to the Attorney  
19 General in connection with Seton Sale.

20 First, after the sale was approved by the Court, the Firm’s attorneys were heavily involved  
21 in working with representatives of the Debtors and AHMC to begin and advance the process of  
22 preparing to close the Seton Sale, including with respect to the Attorney General review of the  
23 transaction.

24 Second, the Debtors, AHMC and the Attorney General engaged in substantial and lengthy  
25 negotiations concerning the proposed conditions to be imposed on the Seton Sale. The Attorney  
26 General imposed certain additional conditions (“Additional Conditions”) on the sale, which  
27 required the Firm’s attorneys to prepare a motion to enforce the Seton Sale Order and approve the  
28 Seton Sale free and clear of the Additional Conditions, pursuant to the terms of the approved asset

1 purchase agreement. Ultimately, as a result of these negotiations, the parties entered into a  
2 consensual resolution of the Additional Conditions that did not require the Debtors to engage in  
3 motion practice.

4 Further, the Firm devoted substantial resources to negotiating with Seton's unions and the  
5 subsequent briefing on rejection of the collective bargaining agreements (collectively, "CBAs").  
6 The Debtors filed an omnibus motion [Docket No. 5115] to reject certain CBAs, pursuant to § 1113,  
7 as well as separate motions [Docket Nos. 5118, 5120] to reject certain trust agreements with the  
8 Retirement Plan for Hospital Employees and the Local 39 Pension. With the exception for one  
9 non-objecting union, the Firm's attorneys reached consensual resolutions of the omnibus motion  
10 [Docket No. 5198] and obtained a memorandum of decision [Docket No. 5306] granting the  
11 omnibus motion. Further, on August 12, 2020, the Court entered orders [Docket Nos. 5471, 5472]  
12 granting the trust agreement rejection motions.

13 The Firm's attorneys devoted substantial effort to document the sale closing as required  
14 under the Asset Purchase Agreement. Dentons attorneys finalized all closing documents, including  
15 voluminous disclosure schedules, closing statements and certificates, assignments, bills of sale,  
16 deeds and related documentation required to document the complex Seton Sale. Further, the Firm's  
17 attorneys interfaced with third parties, including counsel to the seller, title and escrow, to ensure  
18 the Seton Sale timely closed. On August 14, 2020, the Debtors filed a notice [Docket No. 5501] of  
19 the occurrence of the closing of the Seton Sale.

20 On August 14, 2020, the Debtors filed a notice [Docket No. 5501] of the occurrence of the  
21 closing of the Seton Sale. The attorneys who participated in these tasks during the Sixth Interim  
22 Period included: partners Sam Maizel, Tania Moyron, Claude Montgomery, Samuel Alberts, Sonia  
23 Martin and Ryan Westhoff, Matthew Garms; counsel Malka Zeefe, senior managing associates,  
24 Nicholas Koffroth, Josh Fisher and Adam Dondoyano managing associates Isabella Hsu; associates  
25 David Cook and Carol Yur; and paraprofessionals Kathryn Howard, George Medina and Daniel  
26 Piña.

**B. Closing the Sale of St. Francis and Related Matters**

The Firm has been instrumental in the Debtors' successful efforts to close the sale (the "St. Francis Sale") of St. Francis to Prime Healthcare Services, Inc. ("Prime"), pursuant to the order [Docket No. 4511] (the "St. Francis Sale Order") authorizing the St. Francis Sale. As set forth more fully below, during the Sixth Interim Period, the Firm's attorneys were actively involved in discussions with the Debtors' management, BRG, Cain, Prime, the Committee, the prepetition secured creditors and a wide array of other stakeholders focused on closing the St. Francis Sale. The Firm's attorneys involved throughout this process included not only bankruptcy counsel, but also mergers and acquisition, corporate, labor and employment, insurance and financing experts.

During this period, and as discussed below, the Firm's attorneys also worked closely with the Debtors' accounting staff and financial advisors to address executory agreements related to St. Francis. The Firm's attorneys work with counterparties to thousands of contracts which are subject to assumption and assignment in the sale to Prime over terms and conditions as well as cure amounts. The Firm also obtained approval [Docket No. 5481] of an emergency motion [Docket No. 5424] to reject certain agreements between St. Francis and certain health benefit plan payors and medical groups that would not be assumed and assigned in connection with the St. Francis Sale.

The Firm's attorneys also took the lead on (i) negotiating the terms of the transfer of the Medicare provider agreement with Prime's attorneys (both in-house and external), and counsel to HHS, and (ii) negotiating the terms of the transfer of the Medi-Cal provider agreement with Prime's attorneys (both in-house and external) and counsel to DHCS. The negotiations resulted in the successful approval of stipulations approving the transfer of both Medicare and Medi-Cal provider agreements from St. Francis to Prime in connection with the St. Francis Sale. *See* Docket Nos. 5336, 5349, 5447, 5459.

The Firm's attorneys also handled several significant matters related to the Attorney General in connection with the St. Francis Sale.

First, after the sale was approved by the Court, the Firm's attorneys were heavily involved in working with representatives of the Debtors and Prime to begin and advance the process of

1 preparing to close the St. Francis Sale, including with respect to the Attorney General's review of  
2 the transaction.

3 Second, in connection with the Attorney General's review, the Debtors obtained approval  
4 [Docket No. 4796] of an ex parte motion prepared by the Firm [Docket 4708] for authorization to  
5 provide unqualified bids to the Attorney General on a confidential basis in connection with the  
6 AG's review of the St. Francis Sale. The Firm ultimately negotiated with the Attorney General and  
7 obtained approval [Docket No. 4860] a of a stipulation [Docket No. 4847] clarifying the date on  
8 which the Debtors' Attorney General application for the St. Francis Sale was deemed received for  
9 purposes of the Attorney General's statutory review period of the St. Francis Sale.

10 Third, on July 27, 2020, the Debtors filed an emergency motion [Docket No. 5199] to  
11 enforce the St. Francis Sale Order and approve the St. Francis Sale free and clear of certain  
12 Additional Conditions imposed by the Attorney General. Following substantial briefing [Docket  
13 Nos. 5199, 5423] concurrent with confirmation briefing (discussed, below) and the sale closings,  
14 the Court entered a memorandum of decision [Docket No. 5477] granting the emergency motion.  
15 The Firm's attorneys devoted substantial effort toward negotiating an agreed resolution before,  
16 during, and after the briefing to ensure a smooth closing of the St. Francis Sale without an appeal  
17 by the Attorney General, and, on August 13, 2020, the Court approved [Docket No. 5503] a  
18 stipulation [Docket No. 5496] between the Debtors, Prime and the Attorney General that resolved  
19 the emergency motion.

20 Further, the Firm devoted substantial resources to negotiating with St. Francis's unions and  
21 the subsequent briefing on rejection of the CBAs. On May 19, 2020, the Debtors filed motions  
22 [Docket Nos. 4741, 4742] to reject collective bargaining agreements with SEIU and UNAC related  
23 to St. Francis. On July 1, 2020, the Debtors filed an omnibus reply and final brief [Docket No.  
24 4987] in support of their motions to reject certain CBAs related to SFMC, pursuant to § 1113. On  
25 July 14, 2020, the Court entered an order [Docket No. 5082, 5083] granting the motions to reject  
26 the SFMC CBAs.

27 The Firm's attorneys devoted substantial effort to document the sale closing as required  
28 under the Asset Purchase Agreement. Dentons attorneys finalized all closing documents, including



1 voluminous disclosure schedules, closing statements and certificates, assignments, bills of sale,  
2 deeds and related documentation required to document the complex St. Francis Sale. Further, the  
3 Firm's attorneys interfaced with third parties, including counsel to the seller, title and escrow, to  
4 ensure the St. Francis Sale timely closed. On August 14, 2020, the Debtors filed a notice [Docket  
5 No. 5502] of the occurrence of the closing of the St. Francis Sale.

6 On August 14, 2020, the Debtors filed a notice [Docket No. 5502] of the occurrence of the  
7 closing of the St. Francis Sale.

8 The attorneys who participated in these tasks during the Fifth Interim Period included:  
9 partners Sam Maizel, Tania Moyron, Claude Montgomery, Sonia Martin, John Moe, Matthew  
10 Garms and Ryan Westhoff; senior managing associates Nicholas Koffroth and Adam Dondoyano;  
11 managing associate, Nicholas Carson; and paraprofessionals Kathryn Howard, George Medina,  
12 Daniel Piña and Margaret Welch.

13 **C. The Adversary Proceeding Commenced by the California Nurses Association**

14 On March 5, 2020, the California Nurses Association ("CNA") filed an adversary  
15 proceeding against eight of the Debtors, and Rich Adcock and Steven Sharrer as individuals, and  
16 "Does 1 through 500." *See* Docket No. 4218; *see also* Adv. Pro. No. 2:20-ap-01051-ER, Docket  
17 No. 1. In the Complaint, CNA accused the defendants of violating the Federal Worker Adjustment  
18 And Retraining Notification ("WARN") Act, 29 U.S.C. §§ 2101, *et seq.*, the California WARN  
19 Act, California Labor Code §§ 1400, *et seq.*, and California state tortious misrepresentation law in  
20 connection with the termination of employment of CNA-represented employees resulting from the  
21 closure of St. Vincent. *See id.* On April 6, 2020, defendants filed motions to dismiss the adversary  
22 proceeding for, among other reasons, inapplicability of the WARN Acts to liquidating fiduciaries,  
23 and failure to state claims for intentional or negligent misrepresentation. *See* Adv. Pro. No. 2:20-  
24 ap-01051-ER, Docket Nos. 12-13. On May 12, 2020, CNA filed its opposition to defendants'  
25 motions to dismiss. *See id.*, Docket No. 24. On May 22, 2020, defendants filed their reply to  
26 CNA's opposition to defendants' motion to dismiss and response to CNA's objection to judicial  
27 notice requests in support of defendants' reply. *See id.*, Docket Nos. 25, 27. The Bankruptcy Court  
28

1 previously determined that the motion to dismiss was suitable for disposition without oral  
2 argument. *See id.*, Docket No. 18.

3 On March 19, 2020, CNA sought to withdraw the reference of the adversary proceeding to  
4 the District Court. *See id.*, Docket No. 9; Case No. 2:20-cv-02623-SVW, Docket No. 1 (C.D. Cal.).  
5 On May 4, 2020, defendants filed oppositions to withdrawal of the reference and request for judicial  
6 notice. *See* Case No. 2:20-cv-02623-SVW, Docket Nos. 16-17 (C.D. Cal.). CNA filed its reply on  
7 May 11, 2020. *See* Case No. 2:20-cv-02623-SVW, Docket No. 20 (C.D. Cal.).

8 The Debtors and CNA agreed to attempt to resolve the adversary proceeding by attending  
9 mediation (the “Mediation”) before Retired United States Bankruptcy Judge David Coar. *See* Case  
10 No. 2:20-cv-02623-SVW, Docket Nos. 24, 27 (C.D. Cal.) (the “Mediator”). The parties agreed to  
11 stay the litigation until the District Court ruled on CNA’s motion to withdraw. *See* Adv. Pro. No.  
12 2:20-ap-01051-ER, Docket Nos. 28-29.

13 The pre-Mediation processes began with responses by defendants to formal questions by  
14 the Mediator and the provision to the Mediator of supporting documentation on June 18, 2020.  
15 Defendants attended a pre-Mediation conference call with the Mediator on June 24, 2020.  
16 Defendants prepared *Mediation Briefs* which were filed on July 14, 2020. As counsel for the  
17 Debtors’, Dentons coordinated with counsel for the individual defendants in the preparation of the  
18 *Mediation Briefs*. Further communications with and in response to the mediator in preparation for  
19 Mediation then occurred.

20 The first day of Mediation, attended by counsel for CNA, counsel for the Debtors and  
21 counsel for the individual defendants, occurred on July 21, 2020. General terms for settlement of  
22 the litigation were agreed on that date. Between July 21, 2020, and July 24, 2020, the parties  
23 negotiated a term sheet memorializing the numerous aspects of the settlement terms. On July 24,  
24 2020, on the second day of Mediation, the Mediator assisted the parties in further negotiation of  
25 and finalization of the term sheet. Thereafter, the Dentons drafted and the parties negotiated the  
26 agreement settling the adversary proceeding which had been brought by CNA on behalf of its  
27 members who had been employed at St. Vincent. Once the settlement agreement was finalized,  
28

1 counsel for the debtors drafted a 9019 Motion and, after negotiation with counsel for CNA and the  
2 individual defendants, the 9019 Motion was filed with the Court and approved.

3 The attorneys who participated in these tasks during the Sixth Interim Period included:  
4 partners Sam Maizel, Tania Moyron, Sandra McCandless, Samuel Alberts and Sonia Martin;  
5 counsel Malka Zeefe; senior managing associates Nicholas Koffroth, Anna Youssefi, Jacqueline  
6 Whipple and Erin Bass; managing associate Isabella Hsu; and paraprofessionals Kathryn Howard,  
7 George Medina and Daniel Piña.

8 **D. The Assumption and Assignment, or Rejection, of Contracts and Leases Related to**  
9 **St. Francis, St. Vincent and Seton**

10 The Firm's attorneys provided services related to advising the Debtors, BRG and other  
11 advisors, in connection with the resolution of certain formal and informal objections to the possible  
12 assumption and assignment of thousands of executory contracts and unexpired leases related to two  
13 separate sales—the St. Francis Sale and the Seton Sale.

14 The Firm's attorneys assisted BRG in negotiating and memorializing resolutions of the  
15 objections with the counterparties and attended regular conferences with the Debtors and their  
16 advisors regarding the same. The Firm's attorneys also negotiated and prepared numerous  
17 stipulations (including omnibus stipulations) [Docket Nos. 4694, 4707, 4768, 4770, 4787, 4788,  
18 4897, 4907, 4920, 4989, 5166] and orders [Docket Nos. 4703, 4711, 4771, 4772, 4789, 4790, 4901,  
19 4919, 4933, 4992, 5180] to allow the parties time to resolve matters when possible.

20 The Firm's attorneys also prepared and filed periodic notices identifying agreements that  
21 would or would not be assumed by the purchaser of St. Francis [Docket No. 4873] and Seton  
22 [Docket Nos. 4990, 5266]. Further, the Firm negotiated stipulations [Docket Nos. 5352, 5369,  
23 5418, 5454, 5458, 5494, 5535] resolving renewed cure objections asserted by the remaining  
24 contract counterparties with respect to the Seton Sale. The Firm's attorneys also made themselves  
25 available to individual creditors and their counsel with questions about the treatment of their  
26 contract, such as directing them to appropriate docket entries.

27 The Firm's attorneys who participated in these tasks during the Sixth Interim Period  
28 included: partner Tania Moyron; and senior managing associate Nicholas Koffroth.

**E. Confirmation of the Plan**

During the Sixth Interim Period, the Firm’s attorneys drafted, negotiated, obtained approval of, and solicited the *Disclosure Statement Describing Second Amended Joint Chapter 11 Plan of Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and the Committee* [Docket No. 4994] (the “Disclosure Statement”) and further negotiated, drafted and confirmed the Plan [Docket No. 5466]. The Plan and Disclosure Statement presented the proposed resolution of these Cases on a consensual basis among the Debtors, the prepetition secured creditors and the Committee. The Firm recorded its time relating to advice, consultation, research, negotiation and drafting the Plan and Disclosure Statement, and all other related matters during the Sixth Interim Period primarily under Task Code 320.

Following the Court’s approval of the sales of St. Francis, Seton and St. Vincent, the Debtors dedicated substantial resources to negotiating and drafting the *Amended Joint Chapter 11 Plan of Liquidating (Dated June 16, 2020) of the Debtors, the Prepetition Secured Creditors, and the Committee* [Docket No. 4879] and the related disclosure statement [Docket No. 4880]. The amended plan and disclosure statement filed in June 16, 2020, resulted, in part, from the Firm’s dedication of substantial resources to negotiating the “Plan Settlement” (as that term is defined in the Plan).

The Plan Settlement was the product of substantial negotiations between the Debtors, the prepetition secured creditors and the Committee that began during the Fifth Interim Period. The negotiations ultimately required the Firm’s attorneys to draft the Plan to address, among other things, resolution of complex litigation, distributions, post-effective date governance and the liquidating trust. The Plan was more complex than a garden variety liquidating plan and required Dentons to research and draft novel resolutions to address the complexities unique to the Debtors’ cases.

First, the Plan Settlement required the Debtors’ attorneys to revise the Plan and related Liquidating Trust to contemplate a multi-priority payment structure that accounted for the distribution of post-effective date recoveries, first, to satisfy the diminution claim of the 2005 Bondholders and, second, for pro rata distribution to holders of general unsecured claims.

1 Second, the St. Francis Sale and Seton Sale required that certain Debtors continue operating  
2 post-effective date until the buyers obtained their licenses because the Debtors operating losses  
3 required the prompt confirmation of the Plan to preserve the value of the Debtors' estates. The  
4 Plan was, therefore, drafted to provide for the rolling dissolution of the 17 debtor entities, depending  
5 on various obligations and other factors, and a nuanced balance between the governance  
6 responsibilities of the post-effective date Debtors and the liquidating trust formed under the Plan.

7 Third, the Plan contemplated the deemed substantive consolidation of the Debtors for  
8 distribution purposes, which required the Firm's attorneys to complete a detailed analysis of the  
9 complex interrelationships between the various Debtors.

10 Fourth, the Plan Settlement and various other third party agreements related to confirmation  
11 required that the Firm's attorneys conduct and incorporate substantial research and analysis  
12 concerning third party releases and recent Ninth Circuit precedent related thereto. The Firm's  
13 attorneys also began the process of revising and drafting the original disclosure statement filed in  
14 September 2019 [Docket No. 2994] to address further developments in these Cases, which included  
15 a comprehensive analysis of the Debtors' corporate structure, the Debtors' prepetition history,  
16 significant events in these Cases, and the tax and securities laws issues related to the Plan and the  
17 proposed liquidating trust. Additionally, the Firm's attorneys worked on the detailed supporting  
18 documents that were intended to be filed along with an amended disclosure statement or plan  
19 supplement such as the liquidating trust agreement, transition services agreement and operating  
20 budget.

21 The Debtors and the 2005 bondholders filed a joint motion [Docket No. 4881] for approval  
22 of the disclosure statement. The Court granted [Docket No. 4889] the parties' joint request [Docket  
23 No. 4885] to hear the motion on an expedited basis, which expedited the approval process and  
24 resulted in the estates limiting the daily operating losses that would have accrued under the periods  
25 contemplated by the Rules and the LBR. Following substantial negotiations with constituents,  
26 spearheaded by the Firm, the Debtors received only five objections to approval of the disclosure  
27 statement. The Firm prepared briefing in support of the disclosure statement motion and also  
28 prepared and filed the proposed forms of ballots and related notices for approval, and, following

1 the hearing on approval of the disclosure statement, filed the amended Disclosure Statement. On  
2 July 2, 2020, the Court approved the Disclosure Statement [Docket No. 4997], and the Firm, with  
3 the support of the approved balloting agent, Kurtzman Carson Consultants LLC, solicited votes on  
4 the Plan and provided publication and mail notice of the voting and confirmation deadlines.

5 The Firm's attorneys continued to negotiate with Case constituents, as well as the joint  
6 proponents of the Plan, which substantially advanced the confirmation process.

7 First, on July 8, 2020, the Firm prepared and filed a motion [Docket No. 5051] to approve  
8 a settlement with the PBGC, which was contemplated as a creditor settlement agreement under the  
9 Plan. The Court approved [Docket No. 5232] the PBGC settlement, resolving any confirmation  
10 objections from a major case constituent.

11 Second, the Court approved [Docket Nos. 5350, 5470] multiple stipulations [Docket Nos.  
12 5338, 5463] resolving informal and filed confirmation objections. Further, the Firm's attorneys  
13 negotiated agreed language to be incorporated into the confirmation order, which resolved  
14 additional objections.

15 The Firm's attorneys engaged in significant briefing and preparation of supporting plan  
16 documents related to plan confirmation. The Firm prepared numerous omnibus responses [Docket  
17 Nos. 5385, 5419, 5425, 5455, 5456, 5468] to substantive confirmation objections [Docket Nos.  
18 5326, 5337, 5339, 5341, 5342, 5343, 5407, 5417, 5448] as well as supplements [Docket Nos. 5443,  
19 5535, 6043] required under the plan and a memorandum of law [Docket No. 5385] in support of  
20 confirmation. On August 12, 2020, the Debtors filed the Plan, which incorporated additional agreed  
21 and negotiated language. On August 14, 2020, the Court entered the order [Docket No. 5504]  
22 confirming the Plan.

23 Following confirmation of the Plan, the Firm's attorneys engaged in substantial efforts, with  
24 the assistance of BRG and the plan proponents, among others, to ensure the Plan became effective,  
25 as required under the creditor settlement agreements and the Debtors' authorization for consensual  
26 use of cash collateral. The Debtors filed and coordinated service of certain notices of confirmation.  
27 Further, the Debtors prepared and filed certain required plan supplements [Docket No. 6043],  
28 including the plan settlement, the liquidating trust agreement, a schedule of insurance policies, the

1 transition services agreements and the initial operating budget. On September 4, 2020, the Plan  
2 became effective [Docket No. 6044].

3 The attorneys who participated in these tasks during the Sixth Interim Period included:  
4 partners Sam Maizel, Tania Moyron, Claude Montgomery, John Moe, Robert Richards, Lee  
5 Whidden and Sonia Martin; counsels Malka Zeefe and Carolyn Richter; senior managing associate,  
6 Nicholas Koffroth; and paraprofessionals Kathryn Howard, George Medina, Daniel Piña and Jennie  
7 Kim.

8 **F. Cash Collateral, Secured Creditors and Bondholders**

9 Dentons recorded its time relating to advice, consultation and litigation relating to all  
10 matters affecting debtor-in-possession financing, use of cash collateral, continuing research and  
11 understanding of the complexities of the Debtors' capital structure and, its prepetition secured bond  
12 and note holders, unsecured lenders and secured trade finance providers and the Committee  
13 regarding same.

14 The Sixth Interim Period commenced with the Court's approval of the *Stipulation to*  
15 *(A) Amend the Third Amended Supplemental Cash Collateral Order, (B) Authorize Continued Use*  
16 *of Cash Collateral, (C) Grant Adequate Protection, (D) Modify Automatic Stay, and (E) Grant*  
17 *Related Relief* [Docket No. 4669] (the "Fourth Amended Cash Collateral Stipulation"). During the  
18 Sixth Interim Period, Dentons advised the Debtors on the negotiations and the drafting of the  
19 necessary documentation to continue the authorized and consensual use of prepetition and  
20 postpetition cash collateral subject to replacement liens as adequate protection replacement  
21 collateral of the prepetition secured creditors. Such documentation included negotiation of three  
22 additional stipulations and related milestones for the continued consensual use of remaining cash  
23 sitting in the "Sales Proceeds Escrow Accounts," as defined in the *Final DIP Order* [Docket 409]  
24 arising from the sale of O'Connor and Saint Louise in the first quarter of 2019, as well as  
25 postpetition accounts receivable, including postpetition government receivables such as quality  
26 assurance fee payments. Important to those stipulations were changes to adequate protection  
27 milestones and changes providing access to certain sale proceeds restricted by the Final DIP Order.  
28

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Those cash collateral modification stipulations included the (1) stipulation by and between Verity and UMB Bank, N.A., as master indenture trustee, and Wells Fargo Bank, National Association, as indenture trustee, and U.S. Bank National Association solely in its capacity, as the note indenture trustee and as the collateral agent under the note indenture relating to the 2015 Working Capital Notes, and U.S. Bank National Association solely in its capacity, as the note indenture trustee and as the collateral agent under the note indenture relating to the 2017 Working Capital Notes, and Verity MOB Financing, LLC and Verity MOB Financing II, LLC, as set forth in the *Stipulation Continuing Plan Milestone Approved by the Final Order Approving Stipulation to (A) Amend the Third Amended Supplemental Cash Collateral Order, (B) Authorize Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify Automatic Stay, and (E) Grant Related Relief* [Docket No. 4840]; (2) stipulation by and between Verity and UMB Bank, N.A., as master indenture trustee, U.S. Bank National Association solely in its capacity, as the note indenture trustee for the 2015 and 2017 Working Capital Notes and Verity MOB Financing, LLC and Verity MOB Financing II, LLC, as set forth in the *Second Stipulation Continuing Plan Milestone Approved by the Final Order Approving Stipulation to (A) Amend the Third Amended Supplemental Cash Collateral Order, (B) Authorize Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify Automatic Stay, and (E) Grant Related Relief* [Docket No. 4872]; and (3) stipulation by and between Verity and UMB Bank, N.A., as master indenture trustee, and Wells Fargo Bank, National Association, as indenture trustee, and U.S. Bank National Association solely in its capacities, as the note indenture trustee and as the collateral agent under the note indentures relating to the 2015 Working Capital Notes and the 2017 Working Capital Notes, and Verity MOB Financing, LLC and Verity MOB Financing II, LLC, *Stipulation to (A) Amend the Fourth Amended Supplemental Cash Collateral Order, (B) Authorize Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify Automatic Stay, and (E) Grant Related Relief* [Docket No. 5150] (stipulations (I), (II) and (III) are referred to as the “Final Period Stipulations”).

Those successfully negotiated Final Period Stipulations were approved respectively by the (I) *Order Approving Stipulation Continuing Plan Milestone Approved by the Final Order Approving Stipulation to (A) Amend the Third Amended Supplemental Cash Collateral Order,*



1 *(B) Authorize Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify*  
2 *Automatic Stay, and (E) Grant Related Relief, signed on 6/5/2020 [Docket No.4841]; (II) Order*  
3 *Approving Second Stipulation Continuing Plan Milestone Approved by the Final Order Approving*  
4 *Stipulation to (A) Amend the Third Amended Supplemental Cash Collateral Order, (B) Authorize*  
5 *Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify Automatic Stay,*  
6 *and (E) Grant Related Relief, signed on 6/17/2020 [Docket No. 4895], and (III) Final Order*  
7 *Approving Stipulation to (A) Amend the Fourth Amended Supplemental Cash Collateral Order,*  
8 *(B) Authorize Continued Use Of Cash Collateral, (C) Grant Adequate Protection, (D) Modify*  
9 *Automatic Stay, and (E) Grant Related Relief, signed on 7/20/2020 [Docket No.5151].*

10 The cash collateral milestones negotiated by the Debtors with Dentons active assistance  
11 related to (i) full funding of a budget negotiated with the prepetition secured creditors and  
12 (ii) preservation of the Debtors' ability to successfully sell the hospitals on terms acceptable to the  
13 prepetition secured creditors in light of the failure of SGM to close the SGM Sale and the  
14 termination of the SGM APA on December 27, 2019.

15 During the Sixth Interim Period, Dentons continued to focus on Committee challenges to  
16 prepetition secured lender liens. Given the failure of the SGM Sale, Dentons' focus shifted in the  
17 earlier Fourth Interim Period from mediation efforts and efforts to resolve the Challenges filed by  
18 the Committee as adversary proceedings, to the successful defense of the Court's Final DIP Order  
19 before the United States Court of Appeals for the Ninth Circuit (the "Final DIP Order Appeal").

20 While briefing by the parties occurred during the Fourth Interim Period, and oral argument  
21 and related preparations took place during the Sixth Interim Period. The Debtors' defense of the  
22 Final DIP Order Appeal proved successful and on June 9, 2020, the Ninth Circuit affirmed the  
23 District Court's August 3, 2019, dismissal of the Committee's appeal from the Final DIP Order.  
24 The Committee did not seek a rehearing or petition for a writ certiorari to the United States Supreme  
25 Court following its settlement with the Debtors and Secured Lenders and its agreement to become  
26 a joint plan proponent of the Plan. [Docket No. 5468].

27 During the Sixth Interim Period, Dentons professionals paid attention to income tax  
28 remediation issues that could arise in connection with certain bonds. Specifically, Dentons

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1 implemented advice arising from its investigation on methodologies to manage to the possibility  
2 that total secured claims could increase in the event that asset improvements financed with tax  
3 exempt bonds were sold to a non-tax exempt entity or otherwise became subject to a non-qualifying  
4 use. In such event, there is the technical possibility that certain bonds could lose their tax exempt  
5 status, thereby increasing total claims under the bond documents against the Debtors unless the  
6 problem were the subject of an appropriate “remediation” under Internal Revenue Service  
7 regulations and guidelines. Dentons’ professionals attempted to understand and advise the Debtors  
8 on possible approaches to limit the risks associated with such technical issues. During the Sixth  
9 Interim Period, Dentons advised the Debtors on impact of this issues on the sale of assets, including  
10 St. Francis and Seton.

11 During the Sixth Interim Period, Dentons professionals also paid substantial attention to the  
12 PACE Bond Financing (as defined in the Final DIP Order) and its possible impact on the possible  
13 Seton Sale to AHMC approved by the Court on April 23, 2020 [Docket No. 4634]. Specifically,  
14 Seton real property was the subject of a special real property tax assessment and related seismic  
15 improvement bond financing, the purchaser’s assumption of which might have adversely affected  
16 the tax exempt status of certain of the Debtors’ prepetition tax exempt bonds. Dentons professionals  
17 advised on the implementation of the negotiated the *Stipulation Resolving California Statewide*  
18 *Communities Development Authority Lien Release Pursuant to the Proposed Sale of Certain of the*  
19 *Debtors’ Assets Related to Seton Medical Center* [Docket No. 4583] (the “PACE Bond  
20 Stipulation”) by which the PACE Bond Financing would be defeased at the closing of the Seton  
21 Sale. The terms of the PACE Bond Stipulation were approved by the Court pursuant to an order  
22 entered on April 20, 2020 [Docket No. 4613].

23 Dentons professionals engaged in weekly phone conferences with certain of the Debtors  
24 prepetition lenders, during which calls Dentons discussed case matters and upcoming events with  
25 counsel for the Master Trustee and others. Such phone conferences were among the activities  
26 required by the first, second and third amended supplemental cash collateral orders. Dentons has  
27 engaged in a continuous process of disclosure to counsel for the prepetition lenders and the  
28

1 Committee regarding aggregate and inter-debtor cash flow, Budget compliance and projected  
2 results of the asset sales process.

3 Dentons professionals assisted the Committee with respect to their investigation of the  
4 Debtors prepetition secured MOB financings in 2017 and 2018. As part of the settlement embodied  
5 in the Plan, the Committee resolved all of its potential Challenges, within the meaning of the Final  
6 DIP Order, with respect to the prepetition secured MOB financings as well as the adversary  
7 proceedings against the bond indenture trustees for the Secured 2005 Revenue Bonds, the Secured  
8 2015 Revenue Notes and the Secured 2017 Revenue Notes.

9 During Sixth Interim Period, Dentons continued to advise the Debtors as to the issues  
10 associated with continuing public EMMA disclosures for the benefit of its public holders of the  
11 obligated bonds and the need for continuing confidentiality agreements with representatives of the  
12 Secured 2005 Revenue Bonds, the Secured 2015 Revenue Notes and the Secured 2017 Revenue.  
13 Concurrently, Dentons has assisted the Debtors in their efforts to preserve the integrity of the  
14 market place for bond trading by negotiating and implementing periodic renewals of the prepetition  
15 non-disclosure agreements created by Dentons between the Debtors and the prepetition lenders in  
16 order to provide continued access to confidential operating information of the Debtors and potential  
17 bidders for assets.

18 The Dentons attorneys and paraprofessionals primarily responsible for these tasks during  
19 the Sixth Interim Period were: partners, Tania Moyron and Claude Montgomery; senior managing  
20 associates Nicholas Koffroth and Lauren Macksoud; and paralegals Kathryn Howard, George  
21 Medina and Daniel Piña.

22 **G. Prosecuting Litigation Against SGM and Other Defendants, Including the Adversary**  
23 **Proceeding and Defending Appeals**

24 During the Sixth Interim Period, the Firm worked diligently to prosecute significant estate  
25 claims against SGM and its co-defendants related to SGM's failure to close the sale (the "SGM  
26 Sale") of certain of the Debtors' assets pursuant to that certain asset purchase agreement [Docket  
27 No. 2305-1] (the "SGM APA") and contemporaneously responded to SGM's three appeals [Docket  
28 Nos. 3726, 3727, 3746] (the "Appeals") of Court orders related to the SGM Sale. The Adversary

1 Proceeding (defined below) and the Appeals resulted in the Firm preparing, researching and  
2 drafting significant substantive litigation and appellate briefing simultaneously and, at times, on an  
3 expedited basis to preserve the estates' potential recovery on the Debtors' litigation claims.

4 **1. The Adversary Proceeding**

5 On January 3, 2020, the Debtors filed a complaint [Docket No. 1] (the "Complaint") that  
6 commenced an adversary proceeding (the "Adversary Proceeding") against SGM and others,  
7 alleging, *inter alia*, breaches of the SGM APA and promissory fraud. *See* Docket No. 3901; *see*  
8 *also* Adv. Pro. No. 2:20-ap-01001-ER, Docket No. 1. On January 16, 2020, SGM and its co-  
9 defendants filed an emergency motion [Docket No. 3949; Adv. Docket No. 19] to stay the  
10 Adversary Proceeding pending the District Court's ruling on the Appeals.

11 The Firms' attorneys prepared, researched, drafted for and attended a hearing regarding  
12 (i) an opposition [Docket No. 3961; Adv. Docket No. 22] to the request for emergency relief (filed  
13 the same day as the emergency motion) that was sustained [Adv. Docket No. 15], and (ii) a  
14 substantive opposition [Adv. Docket No. 24] that was also sustained [Adv. Docket No. 35] by the  
15 Court.

16 Further, on January 22, 2020, SGM and its co-defendants sought withdrawal of the  
17 reference of the Adversary Proceeding from the Court to the United States District Court for the  
18 Central District of California (the "District Court"). *See* Adv. Docket No. 20; *see also* *Verity Health*  
19 *Sys. of Cal., Inc. v. Chaudhuri, et al.*, Case No. 2:20-cv-00613-DSF, Docket No. 1 (C.D. Cal.). The  
20 Debtors researched, drafted and filed an opposition [Case No. 2:20-cv-00613, Docket No. 11] on  
21 February 4, 2020.

22 On February 19, 2020, after the Court denied the motion to stay the Adversary Proceeding,  
23 SGM and its co-defendants filed (i) a special motion to strike [Adv. Docket No. 39] the Complaint  
24 and (ii) a motion to dismiss [Adv. Docket No. 40] the Complaint. The Firm researched and drafted  
25 oppositions [Adv. Docket Nos. 55, 56] to the two motions, which were filed on March 4, 2020.  
26 Ultimately, the Court vacated the hearings on the motions after the District Court withdrew the  
27 reference of the Adversary Proceeding [Case No. 2:20-cv-00613, Docket No. 23] on March 5, 2020.  
28

1 On March 11, 2020, the Debtors filed an amended complaint [Case No. 2:20-cv-00613,  
2 Docket No. 29] (the “Amended Complaint”). On April 14, 2020, the District Court entered an  
3 order [Case No. 2:20-cv-00613, Docket No. 36] granting the parties’ stipulation to stay the  
4 Adversary Proceeding pending resolution of the pending appeals. Pursuant to that stipulation, the  
5 stay of the Adversary Proceeding terminated on July 10, 2020.

6 On July 10, 2020, SGM and its co-defendants filed a partial motion to dismiss the Amended  
7 Complaint [Case No. 2:20-cv-00613, Docket No. 39], as well as Defendants’ answer and SGM’s  
8 counterclaim against the Debtors [Case No. 2:20-cv-00613, Docket No. 40]. The Firm researched  
9 and drafted opposition papers [Case No. 2:20-cv-00613, Docket Nos. 46-48], which were filed on  
10 July 21, 2020. SGM filed its reply on July 27, 2020 [Case No. 2:20-cv-00613, Docket No. 53]. On  
11 August 4, 2020, the Court entered its Order denying, in full, SGM’s motion to dismiss the Amended  
12 Complaint. [Case No. 2:20-cv-00613, Docket No. 56].

13 The Firm then met and conferred with counsel for Defendants to prepare a *Joint Case*  
14 *Management Statement*, which was filed on July 20, 2020. [Case No. 2:20-cv-00613, Docket  
15 No. 45]. The Firm also prepared and served *Initial Disclosures* pursuant to Federal Rule of Civil  
16 Procedure 26, which identified key witnesses, categories of documents, and claimed damages. On  
17 July 22, 2020, the Court entered its “*Order Re Jury Trial*” including the deadlines for the case, as  
18 well as ordered the parties to engage in alternative dispute resolution [Case No. 2:20-cv-00613,  
19 Docket Nos. 51-52].

20 On July 31, 2020, the Firm researched and filed the Debtors’ motion to dismiss or to strike  
21 SGM’s counterclaim, as well as supporting papers [Case No. 2:20-cv-00613, Docket Nos. 54-55].  
22 In response to the Court’s August 4 Order and the Debtors’ motion to dismiss, SGM filed its  
23 amended counterclaim on August 20, 2020. [Case No. 2:20-cv-00613, Docket No. 58].

24 On September 3, 2020, the Firm researched and prepared the Debtors’ motion to dismiss  
25 SGM’s amended counterclaim, along with supporting papers [Case No. 2:20-cv-00613, Docket  
26 Nos. 61-64]. On September 21, 2020, the Firm researched and prepared a reply memorandum in  
27 support of the motion [Case No. 2:20-cv-00613, Docket Nos. 67-68]. On September 30, 2020, the  
28 Court entered an Order granting in part and denying in part the Debtors’ motion to dismiss,

1 specifically, the Court dismissed SGM's count III (containing tortious breach of contract claims)  
2 in its entirety. [Case No. 2:20-cv-00613, Docket No. 69]. In its Order, the Court also gave SGM  
3 until October 19, 2020 to amend its counterclaim again, which SGM did not do. [*Id.*] Accordingly,  
4 the Debtors' answer to SGM's amended counterclaim is due November 2, 2020, which the Firm is  
5 currently researching and drafting. [*Id.*]

6 The Firm's professionals have also been engaged in significant discovery efforts on behalf  
7 of the Debtors. On September 8, 2020, the Firm served written responses (and/or objections) to  
8 99 interrogatories, 211 requests for admission, and 511 requests for production propounded by  
9 SGM on the Debtors. In addition, the Firm prepared 270 separate requests for production of  
10 documents to the Defendants, which were served on September 1, 2020. The Firm has also engaged  
11 in substantial efforts relating to document retention, collection and review on behalf of the Debtors.

12 In October 2020, the parties reached an agreement to mediate their dispute with Retired  
13 Judge Randall Newsome. On October 21, 2020, the parties filed a *Joint Stipulation* to extend the  
14 Court's discovery cut-off deadlines, [Case No. 2:20-cv-00613, Docket No. 70]. On October 22,  
15 2020, the Court granted this Joint Stipulation [Case No. 2:20-cv-00613, Docket No. 71].

## 16 **2. The Appeals**

17 On January 23, 2020, SGM filed a motion [Case No. 2:19-cv-10352-DSF, Docket No. 34]  
18 requesting that the District Court grant access to certain documents sealed by the Court's prior  
19 orders. The Firm prepared, researched and drafted an opposition to the request and a request for  
20 judicial notice [Case No. 2:19-cv-10352-DSF, Docket No. 38, 39], which the District Court  
21 sustained [Case No. 2:19-cv-10352-DSF, Docket No. 40].

22 On February 14, 2020, SGM filed an opening brief [Case No. 2:19-cv-10352-DSF, Docket  
23 No. 43] in the consolidated Appeals before the District Court. The Firm's professionals researched,  
24 prepared, negotiated and drafted a joint responsive brief, appendix and request for judicial notice  
25 [Case No. 2:19-cv-10352-DSF, Docket Nos. 55-57] with joint appellees, the Committee and the  
26 California Attorney General, filed on April 13, 2020. The District Court ultimately dismissed the  
27 consolidated appeals as moot [Case No. 2:19-cv-10352-DSF, Docket No. 59] on May 14, 2020,  
28 and tentatively vacated the three underlying orders from the Bankruptcy Court, subject to additional

1 briefing. The Firm's professionals researched and drafted a joint response to the District Court's  
2 tentative decision that was filed on May 28, 2020 [Case No. 2:19-cv-10352-DSF, Docket No. 60].  
3 The District Court entered its final order vacating the Bankruptcy Court orders on June 10, 2020  
4 [Case No. 2:19-cv-10352-DSF, Docket No. 65] (the "Vacatur Order").

5 On July 8, 2020, the Debtors filed a notice of appeal to the Ninth Circuit Court of Appeals  
6 (the "Ninth Circuit Appeal") from (a) the Vacatur Order and (b) a previous District Court order,  
7 entered December 20, 2019, denying the Debtors' emergency motion to dismiss the first-filed  
8 Appeal [Case No. 2:19-cv-10352-DSF, Docket No. 19]. The Firm's professionals prepared and  
9 drafted the notice of appeal [Case No. 2:19-cv-10352-DSF, Docket No. 59], and the statement of  
10 issues and designation of record on appeal that were filed on July 22, 2020 [Case No. 2:19-cv-  
11 10352-DSF, Docket No. 70]. At the Ninth Circuit, the Firm's professionals further prepared and  
12 drafted the required mediation questionnaire [Case No. 20-55720, Docket Nos. 2, 4], which was  
13 filed on July 23 and 24, 2020; and research, prepared, and drafted an opening brief and  
14 corresponding excerpts of record [Case No. 20-55720, Docket Nos. 18 *et seq.*] with joint appellant  
15 the VHS Liquidating Trust, as successor to the Committee, that were filed on October 21, 2020.

16 The Firm's professionals who participated in these tasks during the Sixth Interim Period  
17 included: partners Sam Maizel, Tania Moyron, Sonia Martin, Claude Montgomery, Samuel  
18 Alberts, Jules Zeman, Jae Park and Chris Humphreys; counsel Malka Zeefe; senior managing  
19 associates Nicholas Koffroth and Jacqueline Whipple; managing associate Isabella Hsu; and  
20 associate Rachel Ross.

21 **H. Employee-Related Matters**

22 Dentons advised the Debtors on numerous complex employment matters related to the sales  
23 of Seton and Seton Coastside and related employment terminations; the sale of St. Francis and  
24 related employment terminations; the hiring of Verity employees on a temporary basis as  
25 operations continued for a limited period and employee wind down matters; and the termination of  
26 corporate employees.

1           **1. Employee-Related Matters in Connection with Sale of Seton**

2           Dentons advised the Debtors on numerous employment matters related to the sales of Seton  
3 to AHMC and the termination of Seton employees. Dentons (a) communicated with the Debtors  
4 regarding WARN and other termination-related matters; (b) prepared WARN Notices for groups  
5 of employees working at Seton; (c) identified relevant state and local officials based on the work  
6 location of each of the affected employees and prepared notices to those officials; (d) prepared  
7 related correspondence to union representatives of CNA, National Union of Healthcare Workers  
8 (also known as the NUHW), Local 20 and Local 39, each of which represented employees at Seton;  
9 (e) communicated with the Debtors regarding the WARN notices; (f) communicated with state and  
10 local officials regarding the WARN notices; (g) prepared responses to responding data requests;  
11 and (h) reviewed related correspondence from AHMC, the purchaser of Seton.

12           **2. Employee-Related Matters in Connection with Sale of St. Francis**

13           Dentons advised the Debtors on numerous employment matters related to the sale of  
14 St. Francis to Prime and the termination of St. Francis employees and their hiring by Prime.  
15 Dentons (a) communicated with the Debtors regarding WARN and other termination-related  
16 matters; (b) prepared WARN Notices for groups of employees working at St. Francis; (c) identified  
17 relevant state and local officials based on the work location of each of the affected employees and  
18 prepared notices to those officials; (d) prepared related correspondence to union representatives of  
19 Service Employees International Union (also known as the SEIU) and United Nurses Association  
20 of California/Union of Healthcare Professionals (also known as UNAC), each of which represented  
21 employees at St. Francis; (e) communicated with the Debtors regarding the WARN notices;  
22 (f) communicated with state and local officials regarding the WARN Notices; (g) prepared  
23 responses to responding data requests; and (h) reviewed related correspondence from Prime, the  
24 purchaser of St. Francis.

25           Dentons also advised the Debtors in responding to Prime regarding Prime's requests for  
26 employment-related data from St. Francis, including the drafting of an employee authorization for  
27 the release of certain information to Prime, related work to obtain union approval, and the drafting  
28 of a privacy notice.



1           **3.     Hiring of Employees Needed on a Temporary Basis and Employee Wind**  
2                       **Down Matters**

3           Dentons communicated with the Debtors regarding the need for certain temporary new hires  
4 and drafted offer letters for those employees which were unique to the specific circumstances of  
5 their hiring for temporary work. Dentons also communicated with the Debtors regarding various  
6 employment matters related to the winding down of the Debtors' operations. Dentons also  
7 evaluated employee matters related to a temporary services agreement. Dentons further advised  
8 the Debtors regarding the retention of employees to assist with wind down procedures and the  
9 drafting of letters for extended employment during the wind down phase.

10           **4.     Termination of Corporate Employees**

11           Dentons advised the Debtors on employment matters related to the separation of Verity  
12 Health Services ("VHS") and Verity Business Services ("VBS") employees. Dentons  
13 (a) communicated with the Debtors regarding WARN and other termination-related matters;  
14 (b) prepared WARN Notices for groups of VHS and VBS employees; (c) identified relevant state  
15 and local officials based on the work location of each of the affected employees and prepared  
16 notices to those officials; (d) communicated with the Debtors regarding the notices;  
17 (e) communicated with state and local officials regarding the WARN notices; and (f) prepared  
18 responses to responding data requests.

19           Dentons partner Sandra McCandless, associate Anna Youssefi and a number of other  
20 attorneys and paraprofessionals participated in these tasks.

21           **I.     Monitoring Cases Pending Outside the Bankruptcy Court**

22           Dentons was responsible for managing and monitoring the California courts' dockets of  
23 approximately 67 cases filed in the California Superior and Federal District Courts, including 51  
24 cases filed in the Los Angeles County Superior Court, 8 cases filed in the San Mateo County  
25 Superior Court, 6 cases filed in the Santa Clara County Superior Court, and one case filed in the  
26 San Bernardino County Superior Court. In addition, there is one employment case, one breach of  
27 contract case, and one Chapter 13 case filed in the United States District Court for the Northern  
28 District of California. Most of the state court actions are medical malpractice and employment

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1 cases along with premises liability cases and one class action data breach case. Additionally, there  
2 is one employment case in Small Claims Court in Compton, approximately five cases before the  
3 California Labor Commission and the California Department of Fair Housing and Employment, as  
4 well as Workers' Compensation matters, Labor Grievances, and Administrative Actions, including  
5 one with the Board of Pharmacy of the Department of Consumer Affairs for the State of California,  
6 and another filed in the Bankruptcy Case by the California Nurses Association.

7 Dentons was and remains responsible for managing CT Corporation notices of service of  
8 subpoenas for employment and medical records issued to the Debtors for records related to cases  
9 in which Verity or its related entities are not defendants, and for managing CT Corporation's service  
10 of summons for new complaints for lawsuits filed against the Debtors. Dentons reviews the  
11 subpoenas for procedural and substantive compliance with applicable rules, and prepares a report  
12 with its analysis to assist Verity in its response to the subpoenas. In some cases, Dentons confers  
13 with the party serving the subpoenas to address defects in the subpoenas and coordinates on issues  
14 pertaining to the production.

15 Dentons reviewed and received notices of intent to sue that the Debtors receive from third  
16 parties. Dentons also evaluated the event(s) giving rise to the claim that occurred pre-petition or  
17 post-petition to determine if the automatic stay prevents the case from moving forward. Depending  
18 on the outcome, Dentons served counsel with a letter advising of the automatic stay and demands  
19 dismissal, and also filed a notice of automatic stay in the state action. In cases already on file prior  
20 to the bankruptcy, Dentons ensured that a notice of automatic stay is on file.

21 Additionally, Dentons monitored certain state law cases, including researching status and  
22 making appearances when necessary to apprise the courts of the status of the bankruptcy.

23 Dentons was responsible for reporting all court matters and sending status reports to the  
24 Debtors.

25 Dentons kept detailed litigation management charts tracking all cases and claims against  
26 the Debtors which includes, among other things, case summaries, upcoming deadlines and the date  
27 of the filing of notices of automatic stay.

28 Depending on the type of case, Dentons also conferred with defense counsel on litigating

the cases where there is relief from the automatic stay. During the litigation, Dentons worked with litigation counsel to assist with settlement and alternative dispute resolution. Throughout the litigation of the matter, Dentons retained responsibility to monitor the state litigation.

Dentons also reviews proof of claims and complaints to assess potential liability.

The Dentons attorneys primarily responsible for these tasks were partner John Moe and counsel Karleen Murphy, and paraprofessional Kathryn Howard.

**J. Preparation and Review of Professionals' Monthly and Interim Fee Applications**

**1. Preparation and Entry of Order on Dentons' Fourth Interim Application**

Dentons prepared and filed the *Debtors' Notice of Motion and Motion for Entry of an Order Establishing Procedures for Monthly Payment of Fees and Expense Reimbursement* [Docket No. 363], on which the Court entered on October 25, 2018, the *Fee Procedures Order* [Docket No. 661].

During the Sixth Interim Period, Dentons prepared its Fifth Interim Application filed July 15, 2020 [Docket No. 5097], on which an Order was entered on August 12, 2020 [Docket No. 5483]. Several Dentons attorneys prepared descriptions of key tasks performed by Dentons during the Sixth Interim Period, including Samuel Maizel, John Moe, Claude Montgomery, Tania Moyron, Sandra McCandless, Patrick Maxcy, Anna Youssefi and Karleen Murphy.

The Dentons attorneys and paraprofessional primarily responsible for preparing the Fifth Interim Application were: partners John Moe, Samuel Maizel and Tania Moyron; senior managing associate Nicholas Koffroth; and paralegal Kathryn Howard.

**2. Review of Other Professionals' Fee Applications**

During the Sixth Interim Period, Dentons monitored and/or reviewed the fee applications ("Monthly Fee Applications") filed by other professionals engaged in this case, including: the Debtors' financial advisor, BRG; counsel for the Creditors' Committee and its financial advisors, Milbank LLP, and FTI Consulting, respectively; Nelson Hardiman, LLP; the Patient Care Ombudsman and its counsel, Levene Neale Bender Yoo & Brill LLP; conflicts counsel, Pachulski Stang Ziehl & Jones LLP; and employment law counsel, Jeffer Mangels Butler & Mitchell and Bartko Zankel Bunzel & Miller.

1 After each set of Monthly Fee Applications were filed by most or all Professionals, Dentons  
2 prepared and filed *Notices of Monthly Fee Applications for Allowance and Payment of Interim*  
3 *Compensation and Reimbursement of Expenses*<sup>4</sup> filed on May 22, 2020 [Docket No. 4775]; on  
4 June 15, 2020 [Docket No. 4871]; on July 24, 2020 [Docket No. 5187]; on September 11, 2020  
5 [Docket No. 6067]; on September 14, 2020 [Docket No. 6069]; and on October 28, 2020 [Docket  
6 No 6186].

7 The Dentons attorneys and paraprofessional who were primarily responsible for these tasks  
8 were partners John Moe, Samuel Maizel and Tania Moyron, and paralegal Kathryn Howard.

9 **3. Dentons' Monthly Fee Statements**

10 In accordance with the Order establishing procedures for monthly payment of fees and  
11 expense reimbursement, Dentons prepared and filed its Monthly Fee Applications on May 22, 2020  
12 for March 2020 [Docket No. 4774]; on June 15, 2020 for April 2020 [Docket No. 4869]; on July 24,  
13 2020 for May 2020 [Docket No. 5185]; on September 11, 2020 for June 2020 [Docket No. 6066];  
14 on September 14, 2020 for July 2020 [Docket No. 6068]; and October 28, 2020 for the period  
15 August 1, 2020 through September 4, 2020 [Docket No. 6185].

16 Dentons prepared and submitted to the Office of the United States Trustee its Statements in  
17 LEDES format.

18 Dentons spent extensive time attempting to ensure that Task Codes billed by Dentons' of  
19 attorneys and paraprofessionals were billed to the correct Debtor and to a correct Task Code. In  
20 connection the exercise of its billing judgment, Dentons reduced the fees for preparing those  
21 Monthly Fee Statements during the Sixth Interim Period, in the total amount of \$38,784.00, plus  
22 Dentons further reduced its fees by \$200,000.00 totaling fee reductions of \$238,784.00.

23 The Dentons attorneys and paraprofessionals who were primarily responsible for these tasks  
24 were partners John Moe, Samuel Maizel and Tania Moyron, and paralegal Kathryn Howard.

25  
26  
27  
28 <sup>4</sup> Dentons also prepared *Supplemental Notices of Monthly Fee Application(s)*, when not all Fee  
Applications were filed by the date the original Notices were filed.

V.

**COSTS AND SUMMARY OF EXPENSES**

Between August 31, 2018, and April 30, 2020, Dentons incurred expenses of \$91,537.71, \$43,626.33, \$32,794.65, \$61,509.47 and \$75,295.12 during the previous five interim periods.

For the Sixth Interim Period, the total costs and expenses incurred for which Dentons seeks reimbursement is \$86,426.34. The amounts of expenses incurred by Dentons each month was \$18,029.93 in May, \$25,642.81 in June, \$19,179.99 in July, and \$23,573.61 from August through September 4, 2020.

The Fee Guidelines require that an application seeking reimbursement of expenses include a summary identifying all expenses by category. To assist the Court in reviewing Dentons' request for reimbursement of the expenses incurred in connection with its representation of the Debtors during the Sixth Interim Period, Dentons' accounting procedures for the general categories of costs and expenses for which it seeks reimbursement by this Final Application are described in the Declaration attached hereto. The requested expenses are charged at rates customarily applied to Dentons' debtor clients. Those charges are:

<b>Costs/Expenses</b>	<b>Amount Billed</b>
Filing Fees	\$8,638.09
Copies	\$25.70
Legal Research (Westlaw/Lexis)	\$63,084.23
Federal Express/Postage/Delivery/Service of Process	\$2,054.01
Outside Professional Services	\$11,707.71
Transcripts	\$917.50
<b>Total</b>	<b>\$86,426.34</b>

Separate itemized Statements on Expenses incurred during the Sixth Interim Period are included as part of Exhibits "D," "E," "F" and "G."

VI.

**LEGAL ARGUMENT**

In determining the amount of allowable fees under § 330, courts are to be guided by the same "general principles" as are to be applied in determining awards under the federal fee-shifting statutes, with "some accommodation to the peculiarities of bankruptcy matters." *In re Manoa*

1 *Finance Co., Inc.*, 853 F.2d 687, 691 (9th Cir. 1988); see *Meronek v. Arter & Hadden, LLP* (*In re*  
2 *Meronek*), 249 B.R. 208, 213 (B.A.P. 9th Cir. 2000) (reiterating that *Manoa Finance* is the  
3 controlling authority and characterizing the factor test identified in *Johnson v. Georgia Highway*  
4 *Express, Inc.*, 488 F.2d 714 (5th Cir. 1974) and *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70  
5 (9th Cir. 1975), *cert. denied*, 425 U.S. 951 (1976), as an “obsolete laundry list” now subsumed  
6 within more refined analyses).

7 The Supreme Court has evaluated the lodestar approach and endorses its usage. In *Hensley*  
8 *v. Eckerhart*, 461 U.S. 424 (1983), a civil rights case, the Supreme Court held that while the  
9 *Johnson* factors might be considered in setting fees, the lodestar amount subsumed many of those  
10 factors. *Hensley*, at 434, n. 9. The following year, another civil rights case, *Blum v. Stenson*, 465  
11 U.S. 886 (1984), provided the so-called lodestar calculation: “The initial estimate of a reasonable  
12 attorney’s fee is properly calculated by multiplying the number of hours reasonably expended on  
13 the litigation times a reasonable hourly rate... Adjustments to that fee then may be made as  
14 necessary in the particular case.” *Blum*, 465 U.S. at 888.

15 Then, in 1986, the Supreme Court more explicitly indicated that the factors relevant to  
16 determining fees should be applied using the lodestar approach, rather than an *ad hoc* approach.  
17 While holding that the attorney’s fee provision of the Clean Air Act, 42 U.S.C. § 7401, *et seq.*,  
18 should be interpreted like that of the Civil Rights Act, 42 U.S.C. § 1983, the Supreme Court  
19 expressly rejected the *ad hoc* application of the factors set forth in *Johnson* and thus *Kerr*, stating  
20 that “the lodestar figure includes most, if not all, of the relevant factors constituting a ‘reasonable’  
21 attorney’s fee...” *Pennsylvania v. Del. Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 563-  
22 66 (1986); see also *Blanchard v. Bergeron*, 489 U.S. 87, 94 (1989) (“we have said repeatedly that  
23 the initial estimate of a reasonable attorney’s fee is properly calculated by multiplying the number  
24 of hours reasonably expended on the litigation times a reasonable hourly rate”).

25 While the lodestar approach is the primary basis for determining fee awards under the  
26 federal fee-shifting statutes and Bankruptcy Code, some of the *Johnson/Kerr* factors, previously  
27 applied in an *ad hoc* fashion, can still apply in calculating the appropriate hourly rate to use under  
28 the lodestar approach. *In re Charles Russell Buckridge, Jr.*, 367 B.R. 191, 201 (C.D. Cal. 2007)

1 (“a court is permitted to adjust the lodestar up or down using a multiplier based on the criteria listed  
2 in § 330 and its consideration of the *Kerr* factors not subsumed within the initial calculations of the  
3 lodestar”); see also *Dang v. Cross*, 422 F.3d 800, 812 (9th Cir. 2005) (court may “adjust the lodestar  
4 amount after considering other factors that bear on the reasonableness of the fee”); *Unsecured*  
5 *Creditors’ Comm. v. Puget Sound Plywood, Inc.*, 924 F.2d 955, 960 (9th Cir. 1991) (“Although  
6 *Manoa* suggests that starting with the ‘lodestar’ is customary, it does not mandate such an approach  
7 in all cases... Fee shifting cases are persuasive, but due to the uniqueness of bankruptcy  
8 proceedings, they are not controlling.”).

9 Dentons respectfully submits that the hourly rates for its attorneys and paraprofessionals  
10 are reasonable and appropriate in the relevant community and in view of the circumstances of this  
11 case and the successful results thus far achieved by Dentons achieved on behalf of the Debtors.  
12 Further, Dentons has (i) discounted its rates by 15%, (ii) waived all travel costs and expenses, and  
13 (iii) and reduced its fees in its last fee application by \$212,965, plus provided other substantial  
14 discounts, where appropriate. Thus, by this Final Interim Application, Dentons requests that the  
15 Court approve the allowance of compensation and the reimbursement of expenses during the Sixth  
16 Interim Period. The full scope of the services provided and the related expenses incurred are fully  
17 described herein and/or in the attached Billing Statements, Exhibits “D,” “E,” “F” and “G.” All  
18 services for which Dentons requests compensation were performed for or on behalf of the Debtors.

19 The professional services and related expenses for which Dentons requests allowance of  
20 compensation and reimbursement of expenses were rendered and incurred in connection with this  
21 case in the discharge of Dentons’ professional responsibilities as attorneys for the Debtors in this  
22 chapter 11 case. Dentons’ services were necessary and beneficial to the Debtors and their estates,  
23 creditors and other parties in interest.

24 In accordance with the factors enumerated in § 330, it is respectfully submitted that the  
25 amount requested by Dentons is fair and reasonable given (a) the complexity of the case, (b) the  
26 time expended, (c) the nature and extent of the services rendered, (d) the value of such services,  
27 and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Dentons’  
28 representation of the Debtors in these complex cases resulted in substantial benefits to the Debtors’

1 estates and the successful resolution of the Debtors' chapter 11 cases with the confirmed Chapter 11  
2 Plan.

3 Therefore, for the reasons set forth above, Dentons respectfully submits that the foregoing  
4 establishes that Dentons' requested fees and expenses are reasonable and appropriate and should  
5 be approved by this Court.

6 **VII.**

7 **CONCLUSION**

8 For the period of August 31, 2018, through April 30, 2020, Dentons requests the Court to  
9 affirm its prior award of fees totaling \$17,934,607.27 and expenses totaling \$304,763.83.

10 For the Sixth Interim Period, Dentons requests entry of an Order awarding fees of  
11 \$3,278,649.87 and \$86,426.34 in expenses, of which \$2,276,323.77 has been paid and  
12 \$1,911,426.16 remains unpaid, authorizing payment of the balance of fees incurred during the Sixth  
13 Interim Period.

14 Dentons requests that the Court approve on a final basis all the fees and costs previously  
15 and currently requested by Dentons as set forth hereinabove.

16  
17 Dated: November 3, 2020

DENTONS US LLP  
SAMUEL R. MAIZEL  
JOHN A. MOE, II  
TANIA M. MOYRON

18  
19  
20 BY: /s/John A. Moe, II  
JOHN A. MOE, II

21 Attorneys for Debtors and Debtors In  
22 Possession  
23  
24  
25  
26  
27  
28



**DECLARATION OF JOHN A. MOE, II**

I, John A. Moe, II, declare as follows.

1. I am a partner with the law firm of Dentons US, LLP, as Debtors' counsel, (the "Firm" or "Dentons"), attorneys of record for Verity Health System of California, Inc., and its sixteen affiliates, debtors and debtors in possession in these procedurally consolidated cases. I am also the billing attorney for Dentons with regard to this matter. The following is within my personal knowledge, and if called upon as a witness, I could and would testify competently with respect thereto. I am submitting this declaration in support of *Dentons US LLP's Final Application for Fees and Expense Reimbursement for the period May 1, 2020 through September 4, 2020* (the "Final Application").

2. Dentons has filed five previous interim applications [Docket Nos. 1799, 2776, 3520, 4250 and 5071, on which the Court has entered Orders approving the fees and costs requested by Dentons [Docket Nos. 2103, 2924, 3648, 4401 and 5483]. The total fees and costs previously awarded to Dentons -- for the period August 31, 2018, through September 4, 2020 -- is \$17,934,607.27 in fees and \$304,763.83 in costs. By way of the Final Application, Dentons requests this Court affirm as a final award its prior awards of fees and costs to Dentons.

3. By way of the Final Application, Dentons seeks an allowance of fees totaling \$3,278,649.87 and reimbursement of expenses totaling \$86,426.34 incurred for services rendered between May 1, 2020, and September 4, 2020 (the "Sixth Interim Period"), for a total of \$4,184,749.93, of which \$2,273,323.77 was paid in accordance with the Monthly Fee Application, and on which \$1,911,426.16 remains unpaid.

4. The actual fees incurred for services rendered during the Sixth Interim Period actually exceed \$4,184,749.93. Dentons has written off: \$38,784 incurred in preparing monthly statements.

5. The expenses incurred during the Sixth Interim Period are \$86,426.34.

6. In addition, because the Debtors are nonprofit institutions serving a charitable mission, Dentons capped all attorneys' hourly rates at \$800 per hour and provided a 15% discount

1 on all standard hourly billing rates for attorneys whose hourly rates are less than \$800, no matter  
2 the standard rate for the timekeeper. This resulted in a fee reduction of more than \$1,000,000.

3 7. As explained in this Final Application, the Firm has received \$2,273,323.77 and is  
4 owed \$1,911,426.16 on account of the fees and expenses incurred during the Sixth Interim Period.

5 8. On behalf of Dentons, I certify that:

- 6 • I have read this Final Application;
- 7 • The compensation and expense reimbursement requested are billed at rates,  
8 in accordance with practices, no less favorable than those customarily  
9 employed by Dentons and generally accepted by Dentons' clients;
- 10 • At all relevant times, Dentons has been a disinterested person as that term is  
11 defined in § 101(14) and has not represented or held an interest adverse to  
12 the interest of the Debtors.
- 13 • Neither Dentons nor any members of Dentons has any agreement or  
14 understanding of any kind or nature to divide, pay over or share any portion  
15 of the fees or expenses to be awarded to Dentons with any other person or  
16 attorney except as among the members and associates of Dentons;
- 17 • To the best of the knowledge, information and belief of the undersigned,  
18 formed after reasonable inquiry, no time has been billed to the Debtors  
19 outside the scope of work authorized by the Order authorizing employment  
20 of the Firm; and
- 21 • To the best of the knowledge information and belief of the undersigned,  
22 formed after reasonable inquiry, the compensation and expense  
23 reimbursement sought herein is in conformity with the LBR, the  
24 Compensation Guidelines for the United States Bankruptcy Court for the  
25 Central District of California and the Guidelines of the Office of the United  
26 States Trustee, except as otherwise noted herein.

27 9. Dentons, in its representation of the Debtors has worked mightily to meet the  
28 requirements of this significantly large case, including working diligently on the sale of the

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1 Debtors' six hospitals. Dentons has prepared and finalized numerous filings in this chapter 11 case,  
2 commenced and defended adversary proceedings and motions, and corresponded with  
3 professionals on various issues. Dentons has advised the Debtors with respect to this case and  
4 various corporate matters. The foregoing services included services from lawyers at Dentons that  
5 specialize in restructuring and other specialties.

6 10. In the ordinary course of its business, the Firm keeps a record of all time expended  
7 by its professionals and para-professionals in the rendering of professional services on a  
8 computerized billing system as follows: At or near the time the professional services are rendered,  
9 attorneys and other professionals of the Firm either: (1) record in writing on a time sheet the  
10 client/matter name or number, the duration of time expended and a description of the nature of the  
11 services performed, or (2) input the time record, including the client/matter number, duration of  
12 time expended, a description of the nature of the services performed directly into the Firm's  
13 computer billing system. For the professionals who record their time using written time sheets, the  
14 information contained in the time sheets is then transcribed into the Firm's computer billing system.  
15 The Firm's computer billing system keeps a record of all time spent on a client/matter, the  
16 professional providing the services and a description of the services rendered. The Firm's computer  
17 billing system computes the time expended by each professional by the respective professional's  
18 billing rate (or, in this case, the professionals' discounted billing rate) to calculate the amount of  
19 the fee associated. The Firm conducts its business in reliance on the accuracy of such business  
20 records.

21 11. I have reviewed the Firm's Monthly Statements for chapter 11 services rendered in  
22 connection with its representation of the Debtors in this case during the Sixth Interim Period, a  
23 copy of each of which Statements are attached to this Declaration as Exhibits "D," "E," "F" and  
24 "G."

25 12. It is the Firm's usual practice to allocate work and assignments in an efficient  
26 manner to achieve an effective result. As demonstrated in this Final Application, the practice has  
27 been followed in this case.  
28

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13. At any time a reimbursable charge is incurred on behalf of a client, such photocopy expenses and the like, employees of the Firm keep a written record of the file number for which the charges were expended and a brief description of the nature of the expense. These records are also transcribed into the computer system which, together with the records of time spent providing professional services, are transcribed onto monthly bills.

14. With respect to costs for the reproduction of documents, the photocopy operator must manually enter in the system the coded “client” number and “matter” number assigned to that particular case and the number of photocopies made. Attached to this Declaration within Exhibits “D,” “E,” “F” and “G” are true and correct copies of the Firm’s Expense Statements for each of the four months.

15. Attached as Exhibit “A” hereto is a list of attorneys and professionals who have been responsible for providing services to the Debtors, the year admitted to practice for each attorney, their rate, total number of hours spent on the case and total fees charge. Attached as Exhibit “B” hereto are the Resumes of all attorneys who have worked on the case. Exhibit “C” consists of separate charts for each Debtor incurring fees, itemizing the hours and fees incurred for each Debtor by 33 Task Codes. As already noted, Exhibits “D,” “E,” “F” and “G” consist of Fee and Expense Statements, for each of the four monthly periods, between May 1, 2020, and September 4, 2020.

16. I have reviewed the requirements of LBR 2016-1. The Final Application complies with Rule 2016.

17. I participated in preparing, am familiar with, and have read the Final Application. To the best of my knowledge, information and belief, the facts in the Final Application are true and correct.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct. Executed this 3rd day of November, 2020.

*/s/ John A. Moe, II*

JOHN A. MOE, II

**EXHIBITS**

- A. List of Attorneys and Professionals who have been responsible for providing services to the Debtors, the year admitted to practice for each attorney, their rate, total member of hours spent on the case and total fees charged.
- B. Resumes of Attorneys.
- C. Fifteen charts for each Debtor incurring fees itemizing the hours and fees incurred by Task Codes.
- D. Fee Statement for May 2020.
- E. Fee Statement for June 2020.
- F. Fee Statement for July 2020.
- G. Fee Statement for August/September 2020.

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# Exhibit A

**EXHIBIT A**

**DENTONS' PROFESSIONALS/PARAPROFESSIONALS FOR ALL DEBTORS  
FINAL APPLICATION PERIOD: MAY - SEPTEMBER 4, 2020**

<b><u>Professionals</u></b>	<b><u>Title</u></b>	<b><u>Rate</u></b>	<b><u>Total Hours</u></b>	<b><u>Total Fees</u></b>
<b><u>PROFESSIONALS</u></b>				
Samuel R. Maizel	Partner	\$800.00	421.90	\$337,520.00
S. Alberts	Partner	\$800.00	329.30	\$263,440.00
C. Montgomery	Partner	\$800.00	512.80	\$410,240.00
A. Sharetta	Partner	\$800.00	8.70	\$6,960.00
O. Pinkas	Partner	\$800.00	.60	\$480.00
R. Millner	Partner	\$800.00	29.00	\$23,200.00
A. Ruegger	Partner	\$800.00	47.10	\$37,680.00
S. Libowsky	Partner	\$800.00	57.10	\$45,680.00
R. Fenton	Partner	\$800.00	3.50	\$2,800.00
B. Greer	Partner	\$800.00	31.40	\$25,120.00
L. Harrison	Partner	\$800.00	114.30	\$91,440.00
M. Maryn	Partner	\$800.00	.70	\$560.00
J. Kattan	Partner	\$800.00	2.00	\$1,600.00
K. Holland	Partner	\$800.00	3.70	\$2,960.00
S. Walker	Partner	\$800.00	9.10	\$7,280.00
S. McCandless	Partner	\$799.00	223.40	\$178,106.55
T. Santoli	Partner	\$799.00	12.10	\$9,667.90
L. Whidden	Partner	\$765.50	93.00	\$71,191.50
S. Martin	Partner	\$760.75	229.00	\$174,213.10
P. Maxcy	Partner	\$739.50	28.60	\$21,149.70
R. Richards	Partner	\$723.00	131.60	\$95,146.80
H. Lutz	Partner	\$714.00	.50	\$357.00
R. Barbarowicz	Counsel	\$714.00	18.60	\$13,280.40
L. Mihalich-Levin	Partner	\$701.26	.90	\$631.13
R. Fayed	Partner	\$663.00	1.20	\$795.80
C. Richter	Counsel	\$646.00	38.70	\$25,000.20

<u>Professionals</u>	<u>Title</u>	<u>Rate</u>	<u>Total Hours</u>	<u>Total Fees</u>
S. Banks	Partner	\$646.00	1.30	\$839.80
P. Stockburger	Partner	\$633.25	1.10	\$696.58
A. Chang	Partner	\$625.00	.50	\$312.50
R. Garms	Partner	\$603.50	161.70	\$97,585.95
T. Moyron	Partner	\$599.25	926.40	\$555,147.25
John A. Moe, II	Partner	\$599.25	426.50	\$255,580.14
N. Petts	Associate	\$578.00	3.10	\$1,791.80
J. Park	Partner	\$569.50	84.70	\$48,236.65
J. Zeman	Partner	\$548.25	85.20	\$46,710.96
E. Bass	Associate	\$548.00	.80	\$438.60
M. Isaacs	Counsel	\$531.26	.90	\$478.13
J. Whipple	Associate	\$527.00	76.00	\$40,052.00
A. Huddleston	Associate	\$522.75	1.20	\$627.30
A. Shiran Youssefi	Associate	\$514.50	257.30	\$132,381.18
M. Irel	Partner	\$510.00	8.20	\$4,182.00
N. Koffroth	Associate	\$501.50	882.10	\$442,374.08
P. Fluke	Partner	\$501.50	15.80	\$7,923.70
C. Bacon-Schulte	Associate	\$484.50	7.10	\$3,439.95
M. Zeefe	Counsel	\$480.25	365.10	\$175,195.58
D. Cooke	Associate	\$471.76	161.30	\$76,094.88
R. Westhoff	Partner	\$468.00	63.50	\$29,718.00
I. Hsu	Associate	\$446.25	210.80	\$94,069.79
G. Miller	Associate	\$442.00	62.30	\$27,536.60
L. Macksoud	Associate	\$437.75	53.80	\$23,550.96
A. Minton	Associate	\$437.75	.80	\$350.20
E. Kagedan	Associate	\$433.50	7.00	\$3,034.50
J. DiChiara	Associate	\$429.25	33.10	\$14,208.18
T. Koshak	Associate	\$426.25	23.50	\$10,087.38
K. Murphy	Counsel	\$416.50	150.80	\$62,808.20
C. Yur	Associate	\$416.50	15.50	\$6,455.75



<u>Professionals</u>	<u>Title</u>	<u>Rate</u>	<u>Total Hours</u>	<u>Total Fees</u>
N. Carson	Associate	\$412.25	8.60	\$3,545.35
A. Ring	Associate	\$382.50	\$9.60	\$3,672.00
J. Fisher	Associate	\$378.00	6.50	\$2,457.00
C. Doherty, Jr.	Associate	\$374.00	251.80	\$94,173.20
C. Keyser	Associate	\$348.50	13.20	\$4,600.20
R. Ross	Associate	\$344.25	14.50	\$4,991.63
S. Schrag	Associate	\$336.00	2.20	\$739.20
A. Dondoyano	Associate	\$323.00	139.00	\$44,897.00
<b><u>PARAPROFESSIONALS</u></b>				
S. Clark	Lit. Support	\$433.50	.50	\$216.75
L. Isenhower	Paralegal	\$340.00	1.20	\$408.00
D. Pina	Paralegal	\$318.75	51.20	\$16,320.04
G. Medina	Paralegal	\$293.25	197.80	\$58,005.47
C. Mercado	Paralegal	\$276.25	1.20	\$331.50
B. Fullerton	Researcher	\$276.25	.30	\$82.88
E. Cobarrubias	Researcher	\$267.75	.80	\$214.21
M. Welch	Paralegal	\$267.75	58.50	\$15,663.38
J. Kim	Paralegal	\$263.50	4.00	\$1,054.00
M. Sanchez	Paralegal	\$255.00	5.00	\$4,985.27
K. Howard	Paralegal	\$250.75	289.70	\$72,642.50
<b>Subtotal</b>			<b>7498.20</b>	<b>\$4,337,107.59</b>
				<b>(\$238,784.00)</b>
<b>Total</b>			<b>7498.20</b>	<b>\$4,098,323.59</b>

# Exhibit B

# Samuel R. Maizel

## Partner



Partner

Los Angeles

D +1 213 892 2910

[samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)

## Overview

Samuel Maizel is a partner in Dentons' Restructuring, Insolvency and Bankruptcy group. His practice includes bankruptcy matters and financial restructuring in- and out-of-court in all industries, and he leads the firm's healthcare industry restructuring efforts nationwide. In chapter 11 cases, he has served as lead counsel to debtors, trustees, and creditors' committees, as well as serving as a trustee, examiner, patient care ombudsman, and consumer privacy ombudsman. He has represented many buyers and sellers of assets in chapter 11 cases. In chapter 9 cases, Sam has represented local hospital districts and other governmental units, as debtor's counsel and as counsel to creditors' committees.

Before joining Dentons, Sam was a partner in a national bankruptcy firm, and previous to that he represented the federal government in bankruptcy, district, and appellate courts nationwide as a trial attorney in the US Department of Justice's Commercial Litigation Branch. He has also served in US Army's The Judge Advocate General's Corps, including service in Operation Desert Shield/Desert Storm, for which he was awarded the Bronze Star Medal. Previously he served as an Infantry Officer in the 101st Airborne Division and the 3rd US Infantry Regiment (The Old Guard).

Sam has lectured extensively, is widely published, and been interviewed on television and radio on bankruptcy topics. Every year since 2007, he has been named a "Super Lawyer" in an annual region-wide peer survey, an honor bestowed on only 5% of Southern California attorneys; holds an AV Preeminent Peer Rating, Martindale-Hubbell's highest recognition for ethical standards and legal ability; and was named a "Best Lawyer in America" for Healthcare in the 21st edition of Best Lawyers in America. He is based in Los Angeles.

## Experience

### Significant Recent Cases

- **Verity Health System of California, Inc.** (Chapter 11 - Central District of California, August 2018-present): Sam leads the firm's representation of this parent not-for-profit company and 16 related entities, including 6 significant operating hospitals, in the second largest hospital bankruptcy case in American history. The firm has already secured court approval of the sale of two hospitals for \$235 million, over the objections of various

- **Astria Health** (Chapter 11 - Washington): Representing Astria Health System in a recent filing of 13 related chapter 11 cases. Located in Yakima, Washington, the health system includes three operating acute care hospitals.
- **Air Force Village West, Inc. dba Altavita** (Chapter 11 – California): Representing Air Force Village West, Inc., in chapter 11 proceedings that will pave the way for the sale of its continuing care retirement community. The Riverside, CA–based company, which does business as Altavita Village, filed in the US Bankruptcy Court for the Central District of California. They have lined up a stalking horse bidder, with the consent of the secured creditors, to sell the 220 acre facility for \$58 million in cash and assumption of certain liabilities. A bid procedures motion was approved on May 14, 2019, with an auction to be held on or about June 5, 2019.
- **Gardens Regional Medical Center & Hospital, Inc.** (Chapter 11 - Central District of California, June 2016-October 2018): Sam led the representation of this 137 bed not-for-profit hospital in Hawaiian Gardens, California in a liquidating bankruptcy case. The hospital was initially sold under section 363 of the Bankruptcy Code in a very successful auction (the purchase price went from \$8.5 million to \$19.5 million). The California Attorney General approved the sale but imposed such onerous economic conditions on the buyer that the sale failed and the hospital was closed. It was sold again, now as a closed hospital, for approximately \$7 million, over the objection of the Attorney General. The case resulted in three published opinions, all on cutting edge issues of bankruptcy law, and a distribution to unsecured creditors.
- Sam served as Chapter 11 Trustee in the bankruptcy case of Carefree Willows, Inc. in Las Vegas, Nevada (Chapter 11 - District of Nevada, 2015-2016). Sam was appointed after five years had failed to produce a resolution of a hotly contested single asset real estate case. In less than six months Sam was able to negotiate a settlement between the parties, and confirm a plan of reorganization which paid the general unsecured creditors in full, allowed equity to retain ownership and to pay the secured debt over \$50 million pursuant to a settlement.
- **San Diego Hospice & Palliative Care** (Chapter 11 – Southern District of California, 2013 -2015): Sam led the representation of the official committee representing unsecured creditors in the bankruptcy of a large hospice and home health provider in San Diego, California. The hospice filed for bankruptcy protection as a result of ongoing operational losses and disputes with Medicare & Medicaid over payments under the Medicare program. The committee counsel wrote and was the co-proponent under the liquidating Chapter 11 plan. Sam led the negotiations with the federal government over its \$112 million claim, which resulted in a 100% distribution to non-governmental unsecured creditors.
- **Gordian Medical, Inc., dba American Medical Technologies** (Chapter 11 – Central District of California, 2012-2015 ): Sam led the representation of a privately owned, durable medical supplier in Irvine, California, which provides wound-care dressings and supplies to more than 4,000 nursing homes, hospices, and other facilities in 49 states. Gordian filed bankruptcy after a complete suspension of Medicare payments. The bankruptcy court confirmed a successful restructuring led by a new value contribution from the owners and leaving equity in control of the company. The plan provided for 100% distribution to non-governmental creditors, and resolved over \$100 million in claims asserted by the Centers for Medicare & Medicaid Services, the IRS and the California Franchise Tax Board.
- **Victor Valley Community Hospital** (Chapter 11 – Central District of California, 2010 - 2013): Sam led the representation of this not-for-profit hospital in Riverside, California. The hospital was initially sold under section 363 of the Bankruptcy Code in a very successful auction. However, the California Attorney General denied the sale. After two years in Chapter 11, and multiple efforts to sell the hospital were stymied, including by government agencies, the hospital was successfully sold, resulting in a confirmed liquidating plan, a significant distribution to unsecured creditors and the hospital continuing to provide services to its community.
- **S&B Surgery Center** (Chapter 11 – Central District of California, 2009 - 2010): Sam led the representation of an ambulatory surgery center in Beverly Hills, California, that was forced into bankruptcy by the collapse and closure of Century City Doctor's Hospital. The bankruptcy court confirmed a plan that was a "true" reorganization in less than eight months, resulting in equity remaining in control of the company, and a

## Additional Debtor Representations

- Sam represented the Chapter 11 debtors in American Hospice, Inc. and related entities, Health Plan of the Redwoods, Health Source Medical Group, Inacom, Pacific Eynet, and Delta Entertainment.
- Sam represents the Chapter 9 debtor in West Contra Costa Healthcare District.

## Additional Trustee Roles

- Sam served as the Chapter 11 Trustee in the cases of Agesong Genesis, LLC, dba Agesong University, and Mayacamas Holdings, LLC, both in San Francisco, California.

## Additional Creditors' Committee Counsel Representations

- Sam represented the Creditors' Committees in Adair County Hospital District, Hawaii Medical Center, Pacifica Hospital of the Valley, Pleasant Care Corporation, Mariner Post-Acute Network, West Contra Costa Healthcare District, Valley Health System, Palm Drive Healthcare District, and Associated Physicians of St. Johns.

## Additional Miscellaneous Representations and Roles

- Sam represented individual creditors in Sun Healthcare Group, NewCare Health Corporation, Integrated Health Services, Assisted Living Concepts, Alpha Healthcare Foundation, FPA Medical Management, MedPartners Provider Network.
- Sam served as counsel to hospital purchasers in Karykeion and Santa Paula Memorial Hospital.
- Sam served as patient care ombudsman and consumer privacy ombudsman in Upland Surgical Institute.
- Sam served as an Examiner in Metropolitan Mortgage & Securities.
- Sam acted as special counsel to the Chapter 11 debtors in Intrepid USA and Fairmont General Hospital, and to the SEC Receiver in Comprehensive Care of Oakland, LLC.
- Sam led the representation of the National Association of Attorneys General (46 states and six territories that were parties to the master settlement agreement with the tobacco industry) since 2000 and as part of that engagement served as counsel to governmental entities in Alliance Tobacco and Carolina Tobacco.
- Sam led the out-of-court restructuring of Health Line Clinical Laboratories.
- Sam served as counsel to the Chapter 7 trustee in Rodeo Canon and Chapter 11 trustee in Estate Financial.

# Recognition

## Honors and Awards

- Ranked for Outstanding Restructuring Lawyers by Turnarounds & Workouts (December 2019)
- Ranked for Bankruptcy and Restructuring in California by *Chambers USA* (2019)
- Ranked for Healthcare in California by *Chambers USA* (2015-2019)
- Recognized by *Best Lawyers in America* (2015-2020), the leading peer-review-based directory of legal practitioners, for Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Law, Health Care Law and Litigation - Bankruptcy

- Recognized for Bankruptcy in Southern California in *Super Lawyers Magazine* (2007-present)
- Recommended for Healthcare - Service Providers by *The Legal 500 US* (2016)
- Listed in *Los Angeles Magazine's* Best Lawyers list for Bankruptcy and Health Care Law (2016)
- Recognized with the Martindale-Hubbell AV Preeminent Rating, Martindale-Hubbell's highest ranking in both legal ability and ethical standards

## In the Media

- "The coronavirus pandemic impact on a hospital bankruptcy," *The Bond Buyer*, April 30, 2020
- "How coronavirus broke America's healthcare system," *Financial Times*, April 30, 2020
- "Astria Health to reorganize, not sell, as the coronavirus affects markets," *Yakima Herald*, April 28, 2020
- "Verity Cleared to Sell Two Hospitals," *The Deal*, April 13, 2020
- "Officials scramble for Seton," *The Daily Journal*, March 6, 2020
- "Daly City Fights to Save Hospital," NBC Bay Area, March 5, 2020
- "County officials: Daly City hospital could shut down as soon as next week," *San Francisco Examiner*, March 4, 2020
- "San Mateo County Holds Emotional Meeting About Closing Seton Medical Center," CBS Bay Area, March 4, 2020
- "San Mateo County Meeting on Seton Medical Center," *Peninsula TV*, March 4, 2020
- "Judge: No turning back Yakima hospital closure," *The Daily World*, January 16, 2020
- "Astria's Yakima hospital's closing may be a symptom of a bigger crisis," *Yakima News*, January 15, 2020
- "Hospital Bankruptcies Leave Sick and Injured Nowhere to Go," *Bloomberg*, January 9, 2020
- "In Rejecting SGM's Allegations of 'Material Adverse Effects' Under APA for Remaining Verity Health Hospitals, Judge Robles Says SGM Operating 'Very Close' to Bad Faith," *Reorg*, Nov. 26, 2019
- "Judge Robles Denies DHCS Request for Stay Pending Appeal of Verity Health Debtors' Sale of Medi-Cal Provider Agreements Free and Clear of DHCS Interests; Sale Order Will Be Certified for Direct Appeal to Ninth Circuit," *Reorg*, Oct. 22, 2019
- "Judge Robles to Rule 'in Due Course' on Verity Health Debtors' Ability to Sell Medi-Cal Provider Agreements Free and Clear of DHCS Interests," *Reorg*, September 25, 2019
- "Circuit Split Deepens: Bankruptcy Court's Jurisdiction over Social Security and Medicare Claims," *Business Law Today*, August 8, 2019
- "The Road to Recovery – Bankruptcy judge approves additional funding for Astria Health," *Yakima Herald*, June 13, 2019
- "Astria Health and Its Biggest Lender Have Different Takes on Bankruptcy, Reorganization," *Yakima Herald*, May 13, 2019
- "Astria Health Says News Billing Vendor Part of Turnaround Plan After Company Went From a 'Banner Year' to Struggling to Pay Vendors," *Yakima Herald*, May 13, 2019
- "Washington Astria Health Files for Ch. 11," *The Deal*, May 7, 2019
- "Verity Collects Approval to Sell Remaining Hospitals," *The Deal*, April 18, 2019

- "Altavita Village Latest Retirement Community Casualty," *The Deal*, March 12, 2019
- "\$610M Stalking Horse Bid For 4 Verity Hospitals Approved," *Law 360*, February 20, 2019
- "Verity Reveals Sale of Remaining Hospitals," *The Deal*, January 18, 2019
- "Verity Health Collects Bid Procedures Approval," *The Deal*, October 25, 2018
- "Verity to Seek Sale of Hospitals in Chapter 11," *The Deal*, September 1, 2018
- "Verity Health System Files For Bankruptcy In California," *Law360*, August 31, 2018
- "Reorganization of Bankrupt Applebee's Franchisee Could Include Existing Owner," *The Wall Street Journal*, April 16, 2018
- "Applebee's Wins First Round in Fight With Bankrupt Franchisee," *Bloomberg*, June 28, 2018
- "RMH Points to Dine Brands for Chapter 11 Filing," *The Deal*, May 10, 2018
- "Freestanding emergency room operator Adeptus may soon emerge from bankruptcy," *The Dallas Morning News*, September 28, 2017
- "With 238 bankruptcies in 18 months, does Texas have an ailing health industry?," *The Dallas Morning News*, September 2017
- "Judge rejects attorney general's bid to block sale of closed hospital," *Daily Journal*, June 9, 2017
- "Maizel '77 Elected to CSHA Board of Directors," *West Point Grad News*, March 9, 2017
- "Healthcare Law 2016: Virtual Round Table," *Corporate LiveWire*, December 2016
- "West Contra Costa Healthcare files Chapter 9," *The Deal*, October 25, 2016
- "Judge clears Gardens Regional sale," *The Deal*, August 1, 2016
- "Gardens Regional auction sees price soar," *The Deal*, July 21, 2016
- "Gardens Regional secures bidding procedures nod," *The Deal*, July 07, 2016
- "DIP dimensions: Loan transplant," *The Deal*, June 23, 2016
- "ABA Says 9th Circ. Decision Disrupts Bankruptcy Appeals," *Law360*, June 14, 2016
- "Gardens Regional looks to resuscitate operations with DIP," *The Deal*, June 07, 2016
- "Riverside's American Hospice gets buyers for all assets, by Kelsey Butler, Posted on May 03, 2016
- "American Hospice gets OK to auction Texas, Virginia operations," *The Deal*, April 08, 2016
- "American Hospice to sell business in Chapter 11," *The Deal*, March 21, 2016
- "Rural hospitals, LTACs tagged for distress amid physician retention, reimbursement risk," *Debtwire*, October 7, 2015
- "PARTNER MOVES - Dentons Adds Health Care Bankruptcy Lawyer Samuel R. Maizel in Los Angeles," *Legal Monitor*, June 29, 2015
- "Dentons Adds Health Care Expert and Bankruptcy Partner," *Law360*, June 25, 2015
- "Sam Maizel Profiled," *California Health Law News*, June 2015
- "Lab Files for Bankruptcy After Settlement of Probe," *The Wall Street Journal*, June 8, 2015
- "Millions remain to be disbursed in SD Hospice," *The San Diego Union-Tribune*, September 16, 2014

## Books and Treatises

- Chapter author, "Unique Issues That Arise in Healthcare Business Bankruptcies," *Reorganizing Failing Businesses*, American Bar Association, July 2017
- Contributing author, *Health Care Insolvency Manual*, American Bankruptcy Institute 1997; revised 2005 and 2012
- Co-author, "Winning Your Bankruptcy Appeal," *ABI's Bankruptcy Appeals Manual*, June 2007; 2nd ed. 2010
- Contributing author, *Collier on Bankruptcy*, Matthew Bender, 2005 - present (on sections 333 and 351)
- Contributing Author, "Workout Issues in the Healthcare Industry," *Business Workouts Manual*, November 26, 2006

## Law Review Articles

- Co-author, "The Medicare Provider Agreement: Is It a Contract or Not? And Why Does Anyone Care?" *The Business Lawyer* (Vol. 71), Fall 2016
- Co-author, "[Killing the Patient to Cure the Disease: Medicare's Jurisdictional Bar Does Not Apply to Bankruptcy Courts](#)," *Emory Bankruptcy Developments Journal* (Vol. 32), February 2016
- Co-author, "Injunctive Relief in Health Care Insolvencies," 24 *California Bankruptcy Journal* 215, 1998
- Co-author, "The Government's Contractual Rights and Bankruptcy's Automatic Stay," 25 *Public Contract Law Journal* 711, 1996
- Co-author, "The Medicare Contract in Bankruptcy: In Which Direction Does University Medical Center Lead?" 11 *Bankruptcy Developments Journal* 405, 1995
- Author, "Intervention in Grenada," 35 *Naval L. Rev.* 47, Spring 1986

## Recent Magazine Articles

- Co-author, Navigating the Pitfalls of Chapter 11 Deposit Management, *ABI Journal*, April 2019 (Selected for *Best of ABI 2019: The Year in Business Bankruptcy*)
- Co-author, "Not So Fast: Bankruptcy Court Reject Attorney General's Review of Sale of Assets of a Closed Hospital," *California Health Law News*, Volume XXXVI, Issue 1, Fall 2017/Winter 2018.
- Co-author, "Binding the Government in Health Care Restructurings: What Notice Is Required?," *ABI Bankruptcy Litigation Committee*, January 2018
- Co-author, "Revising § 351: Dealing with Unwanted Medical Records," Problems in the Code column, *ABI Journal*, May 2017
- Co-author, "Ozenne v. Chase Manhattan Bank (In re Ozenne): Gone for Now, But Not Forgotten," 26 *Norton Journal of Bankruptcy Law and Practice*, Art. 2, April 2017
- Co-author, "Extent of State's Power at Issue in Nonprofit Hospital's Asset Sale," *Journal of Corporate Renewal* (Vol. 30), March 2017
- Author, "Liquidating Healthcare Facilities in California," *Receivership News* (Issue 58), Summer 2016
- Author, "[Lending to the Healthcare Industry: What to Expect From Medicare Receivables](#)," *ABF Journal*, September 2015



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Main Document Page 61 of 1318
- Author, "Does Bankruptcy Avoid Medicare's Exhaustion-of-Administrative-Remedies Requirement?" *California Health Law News*, June 2015
  - Author, "Can Bankruptcy Short-Circuit Medicare's Appeal Process?" *Intensive Care* column, 34 *Amer. Bankr. Inst. J.* 48, April 2015.
  - Author, "The Poor Get Poorer: The Fate of California's Hospitals Under the Affordable Care Act," 32 *California Health Law News*, Winter 2014
  - Author, "Healthcare Law 2014," *Corporate LiveWire*, June 2014
  - Author, "The Poor Get Poorer: The Fate of Distressed Hospitals Under the Affordable Care Act," *Norton Bankruptcy Law Adviser* 1, December 2012
  - Co-author, "California's Experiment With Federal Judicial Control Over Its Prison Healthcare System," 29 *California Health Law News* (No. 3), Summer 2011
  - Author, "The Impact of Healthcare Reform on Financing in the Healthcare Industry," 65 *Consumer Finance Law Quarterly Report* 168, Spring/Summer 2011
  - Author, "The Sale of Nonprofit Hospitals Through Bankruptcy: What BAPCPA Wrought," 30 *Amer. Bankr. Inst. J.* 12, June 2011
  - Author, "A Guide for the Patient Care Ombudsman," *American Bar Association*, February 2011
  - Author, "Repercussions of the Collision of Labor Law and Healthcare Industry Bankruptcies," 29 *Amer. Bankr. Inst. J.* 18, No. 7 September 2010
  - Co-author, "Rejection of CBAs in a Liquidating Chapter 11 of a Healthcare Entity," 4 *ABI Healthcare Committee Newsletter* (No. 4), August 2010
  - Author, "Patient Care Ombudsman: What About Counsel?" 29 *Amer. Bankr. Inst. J.* 14, Feb. 2010
  - Author, "The Financial Crisis Facing America's Hospital Industry: Part II," 28 *Amer. Bankr. Inst. J.* 16, February 2009
  - Author, "The Financial Crisis Facing America's Hospital Industry: Part I," 27 *Amer. Bankr. Inst. J.* 16, Dec./Jan. 2009
  - Author, "The Patient Care Ombudsman Comes to California," 26 *California Health Law News* 2 (No. 3), Winter 2009
  - Author, "Evolving Standards for Appointment of a Patient Care Ombudsman: Section 333 in 'Operation'," 27 *Amer. Bankr. Inst. J.* 40, March 2008
  - Author, "The First Year of the Patient Care Ombudsman in Review: Part II," 26 *Amer. Bankr. Inst. J.* 18, March 2007
  - Author, "The First Year of the Patient Care Ombudsman in Review: Part I," 26 *Amer. Bankr. Inst. J.* 18, March 2007

## Activities and Affiliations

### Presentations

- National Webinar, "Hospital Bankruptcies - Unique Challenges and Current Hot Topics," American Bankruptcy Institute, October 17, 2019
- Panelist, "Resuscitating the Patient - Restructuring Healthcare Entities in the Current Environment" for the Debtor/Creditor Rights Committee of the Business Law Section of the State Bar of Michigan in Detroit,

- Panelist, "Healthcare Restructuring Case Studies", Expert Webcast, June 27, 2019
- Panelist, "The Intersection of Bankruptcy Law and the Healthcare Industry: A Clash of Conflicting Concepts" for the Bay Area Bankruptcy Forum in San Francisco, California, April 29, 2019
- Panelist, "An Overview of Healthcare, Restructuring and Bankruptcies" for the Dentons US LLP Buying Trouble Conference, in Atlanta, Georgia, April 16, 2019
- Speaker, "Sale of California Nonprofit Healthcare Entities in Bankruptcy: When An Irresistible Force Meets An Immoveable Object," California Lawyers Association Nonprofit Organizations Committee, February 21, 2019
- Panelist, "Health Care Bankruptcy Update," 43rd Annual Paskay Memorial Bankruptcy Seminar, Tampa, FL, February 8, 2019
- Moderator, "Hear From the CEOs: What Keeps Them Up At Night?" American Bankruptcy Institute Conference, January 17, 2019
- Panelist, "Healthcare Restructuring Outlook 2019" (discussing topics such as M&A issues, bankruptcy v. out-of-court restructuring, drivers for filing and more), Expert Webcast, January 10, 2019
- Panelist, "Rescuing Hospitals From The Emergency Room" (discussing issues related to sales of hospitals in bankruptcy), American Bankruptcy Institute Southeast Bankruptcy Workshop, July 26-27, 2018
- Speaker, "Unique Issues That Arise in a California Healthcare Restructuring," California Society for Healthcare Attorneys Annual Meeting, April 14, 2018
- Panelist, "Issues Related to State Legalization of Marijuana—a Focus on Bankruptcy Law and the Impact of California's New Law Related to Recreational Use of Marijuana," Southern District of California Judicial Conference, April 4, 2018
- Panelist, "Negotiation Insights: Section 363 Sales," 44th Annual Seminar on Bankruptcy Law & Rules, Southeastern Bankruptcy Law Institute, March 23, 2018
- Moderator and Panelist, "Industry Spotlight: Healthcare Providers in Bankruptcy," 44th Annual Seminar on Bankruptcy Law & Rules, Southeastern Bankruptcy Law Institute, March 23, 2018
- Moderator and Panelist, "Unique Issues That Arise in a Healthcare Restructuring," American Bar Association Business Law Section, December 21, 2017
- Moderator and Panelist, "How Health Care Technology Changes Will Impact Your Practice," American Bankruptcy Institute Winter Leadership Conference, Palm Springs, CA, December 1, 2017
- Panelist, "The Many Commercial Roles of Government - Executory Contracts, Loans, Procurement, 525 Licensing and Grants," National Association of Attorneys General's Bankruptcy From a Government Perspective Seminar, Savannah, GA, November 13, 2017
- Guest Speaker, "Bankruptcy and Restructuring of Health Care Organizations," University of Nevada Las Vegas Boyd School of Law, October 30, 2017
- Panelist, "Debt Restructuring & Asset Sales for Health Care Businesses," Maine Health Care Association Annual Meeting, Rockport, ME, October 5, 2017
- National Webinar, "The Intersection of Healthcare Law and Bankruptcy Law," American Health Lawyers Association's Regulation, Accreditation, and Payment Practice Group, September 6, 2017
- Panelist, "The American Health Care Industry: Facing Financial Uncertainty," Association of Corporate Counsel - Southern California Chapter, Newport Beach, CA, August 2, 2017
- Panelist, "Healthcare Restructuring Issues", Los Angeles County Bar Association, April 27, 2017.

- Panelist, "Has CMS Said Goodbye to the Bankruptcy Court?" American Bar Association Business Law Section, Business Bankruptcy Committee Spring Meeting, New Orleans, LA, April 6, 2017
- Panelist, "Commercial Finance Association Healthcare Asset-based Lending Program," webinar hosted by the Commercial Finance Association, April 4, 2017
- Panelist, "Zika in the Caribbean, and Other Stinging Health Care Insolvency Issues," American Bankruptcy Institute Caribbean Insolvency Symposium, Cayman Islands, February 11, 2017
- Panelist, "Intersection of Healthcare and Bankruptcy," The Bankruptcy Bar Association for the Southern District of Florida, February 7, 2017
- Panelist, "Delivered from Their Distress: Acquisition Challenges and Opportunities of Distressed Hospitals," National CLE Conference, Snowmass, CO, January 7, 2017
- Panelist, "The State of Play: Managing State AG Hot Button Issues in Chapter 11 Cases," American Bar Association Business Law Section's Business Bankruptcy Committee, San Francisco, CA, October 27, 2016
- Panelist, "Restructuring and Bankruptcy Challenges in the 21st Century World of Not For Profits," Commercial Law League of America, San Francisco, CA, October 27, 2016
- 2016 Visiting Distinguished Professor, Southeastern Bankruptcy Institute (SBLI), Atlanta, GA, September 26-30, 2016
- Featured Guest Speaker, "Bankruptcy by the Bayou: Lessons for Healthcare Insolvencies," SBLI and Bankruptcy Judges for the Northern District of Georgia Luncheon, Atlanta, GA, September 28, 2016
- Featured Guest Speaker, Georgia State University College of Law's The Center for Law, Health & Society Luncheon, Atlanta, GA, September 29, 2016
- Panelist, "Full of Patients But Low on Cash: Managing Conflicts Between Health-Care Needs and Budget Woes," GSU College of Law's Tower to the Trenches CLE, Atlanta, GA, September 30, 2016
- Panelist, "The Life Cycle of Intercreditor Agreements - From Cradle to Grave," American Bar Association Business Law Section, Boston, MA, September 8, 2016
- Speaker, "Healthcare Restructuring Outlook: 2016 and Beyond," Expert Webcast, June 2, 2016
- Panelist, "Can You Believe What Politicians Tell You? A Comparison of the Business of Healthcare Delivery Systems in the United States and Canada," American Bar Association Business Law Section, Montreal, Canada, April 7, 2016
- Panelist, "Introduction to Hypothetical, First Day Orders," and presenter, "Setoff and Recoupment – Hypothetical," Bankruptcy from a Government Perspective Seminar, National Association of Attorneys General/States' Association of Bankruptcy Attorneys, Seattle, WA, October 4-7, 2015
- Panelist, "Hot Topics in Healthcare: Game Show Style!," Turnaround Management Association Annual Meeting, Scottsdale, AZ, October 6, 2015
- "Intercreditor Agreements: Problem-solver or an Invitation to a Fight?" American Bar Association Business Law Section Annual Meeting, Chicago, IL, September 29, 2015
- Panelist, "Ethics Issues in Bankruptcy," and "Leadership Development," American Bar Association Business Law Section Annual Meeting, Chicago, IL, September 17-19, 2015
- Speaker, "Trends and Transactions In Acute and Specialty Healthcare," Expert Webcast, DelMorgan & Co.
- "The Healthcare Industry Post-Affordable Care Act: A Bankruptcy Perspective," Emory Bankruptcy Development Journal Symposium 2015: Corporate Panel, February 26, 2015
- "Pandemic or Panacea? The Financial Impact of the ACA on the Modern Healthcare Industry," California

- “The Fate of the Healthcare Industry After the Affordable Care Act: Where Does It Go From Here and Why?” Georgia State University College of Law Center for Law, Health & Society, Atlanta, October 29, 2013
- “Role of Unions in Healthcare,” California Society for Healthcare Attorneys, Newport Beach, CA, April 2013
- “Did Congress Get It Right With the Patient Care Ombudsman?” American Bar Association Business Law Section Spring Meeting: Healthcare and Nonprofits in Bankruptcy Subcommittee Roundtable, Washington DC, April 5, 2013
- “What Healthcare Costs: Bringing Transparency to the Medical Marketplace,” University of California San Francisco/University of California Hastings Consortium on Law, Science and Health Policy, January 23, 2013
- “Battling Strategies - Dueling Perspectives,” How Debtor and Creditor Lawyers Approach Complex Situations, Costa Mesa, CA, May 24, 2012
- “Financially Distressed Healthcare Facilities: Restructuring and Insolvency Options,” Evaluating Bankruptcy and Other Alternatives While Preserving Quality of Care, November 16, 2011
- “Winning Your Bankruptcy Appeal,” Beverly Hills Bar Association, October 4, 2011
- “International Insolvencies: Basic Principles and Current Problems,” American Bar Association Business Law Section 2011 Global Business Law Forum, London, UK, September 23, 2011
- “Cross-Border Insolvencies: Basic Principles of US, UK and EU Bankruptcy Law,” American Bar Association Business Law Section 2011 Global Business Law Forum, London, UK, September 23, 2011
- “The Strategic Role of Examiners,” 27th Annual Bankruptcy & Restructuring Conference, June 9, 2011
- “Examining Examiners and Their Impact on Creditors,” American Bar Association Business Law Section, Boston, MA, April 14, 2011
- “The Beneficent Government: Federal and State Regulators in Bankruptcy Cases,” Los Angeles Bankruptcy Forum, Los Angeles, CA, April 11, 2011
- “Something in the Way They Move...”: Motion Practice in Bankruptcy Appeals,” American Bar Association Business Law Section Business Bankruptcy Committee, New Orleans, LA, October 14, 2010
- “Bankruptcy From a Government Perspective,” National Association of Attorneys General, Attorneys General Training Institute, and the States Association of Bankruptcy Attorneys, Santa Fe, CA, September 14, 2010
- “The Impact of Healthcare Reform on Financing the Healthcare Industry,” American Bar Association Annual Meeting, San Francisco, CA, August 6, 2010
- “Healing Hospitals on the Brink of Bankruptcy,” Georgia State University College of Law Center for Law, Health & Society, Atlanta, GA, April 19, 2010
- “Center for Health & Pharmaceutical Law & Policy Distinguished Guest Practitioner Program,” Seton Hall University School of Law, Newark, NJ, March 25, 2010
- “Doing Business With (or as) a Distressed Company,” California Society for Healthcare Attorneys Fall Seminar, Los Angeles, CA, November 9, 2009
- “Healthcare Bankruptcy Program,” Los Angeles County Bar Association, Los Angeles, April 28, 2009
- “Reality Bites: Representing Nonprofit Organizations in Financial Distress,” American Bar Association Business Law Section, Vancouver, Canada, April 17, 2009
- “Distressed Healthcare Facilities: Restructuring and Insolvency Options,” Strafford Publications, Teleconference, April 8, 2009
- “Financial Meltdown: Impact on Healthcare Institutions,” Healthcare Financial Management Association,

- “Strategies for Distressed Investing and Turnaround Situations in Healthcare,” Healthcare Dealmaking Symposium, New York, NY March 10, 2009

## Memberships

- Fellow, American College of Bankruptcy (2017)
- American Bar Association
  - Chair, Standing Committee on Armed Forces Law (2017 - present)
  - Co-Chair, Business Law Section Business Bankruptcy Committee, Healthcare and Non-Profit Subcommittee (2017 - present)
  - Member, Standing Committee on Armed Forces Law (2013-2017)
  - Chair, Business Law Section Healthcare Committee (2016-present)
  - Chair, Business Law Section Business Bankruptcy Committee, Programs Subcommittee (2010-2013)
  - Chair and previously Vice-Chair, Judicial Division Bench-Bar Bankruptcy Council (2007-2012)
  - Chair, Business Law Section Business Bankruptcy Committee, Secured Creditor Subcommittee
  - Chair, Business Law Section Business Bankruptcy Committee, Litigation Subcommittee
  - Chair, Business Law Section Business Bankruptcy Committee, Executory Contracts Subcommittee
  - Member, Business Law Section Business Bankruptcy Committee, Special Task Force on Bankruptcy Rule 2019 (2008)
- Member, Board of Directors, California Society for Healthcare Attorneys (2017-present)
- Member, Board of Editors, California Health Law News (2010-present)
- Co-Chair, American Bankruptcy Institute Healthcare Insolvency Committee (2003-2007)
- Board of Directors, Turnaround Management Association Southern California Chapter (2008-2010) and Program Chair (2008)
- Financial Lawyers Conference, Board of Governors (2011)

## Areas of focus

### Practices

- Creditor and Equity Committee Representation
- Cross-Border Restructuring Matters
- Debtor Representation
- Distressed M&A, Investing and Debt Trading
- Insolvency Litigation and Enforcement
- Out-of-Court Restructurings and Work-outs
- Restructuring, Insolvency and Bankruptcy

## Industry sectors

Main Document

Page 66 of 1318

- Government
- Life Sciences and Health Care
- Cannabis

## Region

- United States
- Los Angeles

## Education

- George Washington University School of Law, 1985, JD
- Georgetown University, 1983, MA
- United States Military Academy, 1977, BS

## Admissions and qualifications

- California
- Pennsylvania

# Sam J. Alberts

## Partner



Partner

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## Overview

Sam J. Alberts is a partner in Dentons' Restructuring, Insolvency and Bankruptcy group. Ranked by *Chambers USA* for the twelfth consecutive year, Sam has extensive experience in both in- and out-of-court restructurings, in the United States and abroad. Named in *Best Lawyers in America* (2020) for the tenth consecutive year, Sam is well-known for his work representing clients in high-value restructurings, investigations, workouts, litigation and sale transactions. Sam has served as and represented trustees in bankruptcies, as well as creditors, debtors, and other parties, including governmental and quasi-governmental entities. Recommended by *The Legal 500 US*, Sam has extensive work experience with respect to distressed financial institutions, pensions and healthcare.

## Experience

- **Verity Health System** (Chapter 11 - Los Angeles, California). Serving as counsel to the debtors, a large California-based health care system, in the second largest chapter 11 hospital bankruptcy in American history, filed in the US Bankruptcy Court for the Central District of California (Los Angeles) on August 31, 2018. Issues include the marketing and sale of 6 hospitals and related assets, debtor in possession financing of \$185 million, resolving labor issues and collective bargaining agreements, and the treatment of hundreds of millions of dollars of claims arising in connection with pension plans.
- **Astria Health** (Chapter 11 - Washington). Representing Astria Health System in a recent filing of 13 related chapter 11 cases. Located in Yakima, Washington, the health system includes three operating acute care hospitals.
- **International Finance Corporation - World Bank Group**. Leads the firm's panel representation for IFC with respect to various workouts across the globe, including the Juan Santamaria Airport, Costa Rica, which received IFC's Award for Best Recovery for FY 2010.
- **United States Department of the Treasury** (Washington, DC). Special Master to the Treasury Department on applications for suspensions to financially distressed multiemployer pension plans under the Multiemployer Retirement Act (MPRA) of 2014.
- **Federal Deposit Insurance Corporation (FDIC)** in First NBC Bank (Louisiana), Washington Mutual Bank

- **Puerto Rico.** Represented the Fiscal Agency and Financial Advisory Authority and the Government Development Bank for the Commonwealth of Puerto Rico in its restructuring advice prior to Commencement of Title III and VI proceedings under PROMESA.
- **The City of Detroit, Michigan,** Chapter 9 (E.D. Michigan). Represented the Official Committee of Retirees in the largest municipal bankruptcy case in US history. The Committee represented approximately 23,500 retirees who held more than \$9 billion in claims for pension and other post-employment benefits, including health care. The representation resulted in the protection of almost all pension benefits and continued health care benefits under first-of-kind municipal retiree voluntary employment benefit association (VEBA) trusts.
- **Hovensa LLC,** Chapter 11 (St. Croix). Counsel to the Plan Trustee (previously the Official Committee of Unsecured Creditors of Hovensa LLC), which had been the second largest oil refinery and terminal facility in the North Hemisphere. Unsecured claims in the case total more than \$2 billion. Issues involve the sale of assets, assessment of insider claims and related causes of action. This deal won Private Equity Turnaround of the Year award by the Global M&A Network in association with ArcLight, and thus far has resulted in 100% distributions to trade creditors.
- **Greater Southeast Community Healthcare Corporation. et al. and The DCHC Liquidating Trust, Chapter 11** (Washington, DC). Represented the Official Committee of Unsecured Creditors during bankruptcy and, post-confirmation, served as the Plan Trustee in one of the largest restructuring matters ever filed in the District of Columbia. The cases involved five failed hospitals and a management company and led to multi-million dollar recoveries from the sale of assets and claims for director, officer and third party malfeasance, as well as fraudulent conveyance and other avoid actions.
- **Arcapita,** Chapter 11 (S.D. New York). Represented two non-U.S. financial institutions in this first-of-its-kind bankruptcy of a Middle Eastern bank on issues involving Sharia financing.
- **European Investment Bank (EIB) (Europe).** Advised EIB on a \$1 billion financial transaction with Ford (Europe) at a time when the automobile industry was in significant financial distress.
- **Kodak,** Chapter 11 (S.D. New York). Represented the Pension Benefit Guaranty Corporation (PBGC) individually and on the Official Committee of Unsecured Creditors. The PBGC held a claim of more than \$1 billion, which was preserved and protected.
- **Nuo Therapeutics Inc.,** Chapter 11 (Delaware). Representing Nuo Therapeutics Inc., a publicly traded biomedical wound care company, in its Chapter 11 proceedings.
- **New York University and NYU School of Medicine.** Representation of NYU and NYUSOM on several in- and out-of-court restructuring and litigation matters.
- **The Clare at Water Tower, Chapter 11** (N.D. Illinois). Represented the Official Committee Unsecured Creditors (and Residents), which resulted in the successful sale of one of the most valuable continuing care retirement communities (CCRC) in the United States and the protection of residents' interests.
- **Middlebrook Pharmaceuticals,** Chapter 11 (Delaware). Represented the Official Committee of Creditors, which resulted in the sale of assets and 100% plus recovery to unsecured creditors.
- **Allegheny Health, Education and Research Foundation (AHERF),** Chapter 11 (W.D. Pennsylvania). Represented the Commonwealth of Pennsylvania in one of the largest hospital system bankruptcy cases in US history.
- **Lehman Brothers.** Represented various creditors against Lehman Brothers entities in the United States, England and the Netherlands.
- **Refco,** Chapter 11 (S.D. New York). Represented creditors holding approximately \$100 million in claims.



- **Mirant**, Chapter 11 (N.D. Texas). Represented Mirant and its affiliates in one of the largest energy bankruptcy cases filed in the United States.
- **Response Oncology, Inc.**, Chapter 11 (W.D. Tennessee). Represented the debtor, a nationwide group of oncology practices, in its restructuring and ultimate sale of assets.
- **Computer Learning Centers**. Represented SLM Corp. (Sallie Mae) in one of the largest educational bankruptcy case filings in the United States. Assisted SLM on recovery of millions of dollars in claims.
- **MSCi, Inc.**, Chapter 11 (Baltimore, MD). Represented the Official Committee of Unsecured Creditors in the reorganization of MSCi, a publicly traded audio-visual integration company.

## Recognition

### Honors and Awards

- *Chambers USA*, 2005–present
- *Best Lawyers in America* for Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Law and Litigation - Bankruptcy, 2010–present
- *The Legal 500 US*, 2015–2016
- The M&A Advisor's 2014 Restructuring of the Year Award (City of Detroit Chapter 9)
- *The Deal Pipeline's* "Top Bankruptcy Lawyers" league table, 2015–present
- *Benchmark Litigation* as a "Local Litigation Star" in the District of Columbia, 2015-2016
- *Northern Virginia Magazine's* Top Lawyer listing, 2016
- *The Washingtonian* magazine's Best Lawyers list, 2011–present
- Martindale Hubbell A/V, 2003–present
- Top Lawyer, Bankruptcy, by *The Washington Business Journal*, 2006 and 2007 (finalist 2008)

### In the Media

- "Astria Health receives approval for new financing," *Yakima Herald*, December 19, 2019
- "Judge in Astria bankruptcy case orders company to provide ICU nurses," *Yakima Herald*, May 29, 2019
- "Washington's Astria Health Files for Ch. 11," *The Deal*, May 7, 2019
- "Líder de la Cámara de Comercio destaca importancia crucial de foro en desarrollo a pesar de protesta (Leader of the Chamber of Commerce forum highlights crucial importance of developing despite protest)," *Primera Hora*, August 31, 2016
- Guest, "The White House and Congress Debate Efforts to Address Puerto Rico's Growing Economic Crisis," *The Diane Rehm Show*, NPR, February 03, 2016
- "Citing Possible Collusion Between Governor Mapp And ArcLight, Judge Pushes HOVENSA Case To December 17," *The Virgin Islands Consortium*, November 20, 2015
- "Detroit Pension Proposal Gets an Angry Reception," *The New York Times*, May 21, 2014
- "Detroit Union Group Agrees to Add Cash to Grand Bargain Bankruptcy Deal," *Detroit Free Press*, May 20, 2014

- Detroit Retiree Committee Reaches Deal on Pensions, Healthcare, *Reuters*, April 26, 2014
- “Judge Allows Legal Challenge to Detroit’s Plans to Cut Retiree Health Benefits,” *Detroit News*, November 4, 2013
- “Unfinished Business,” *The Wall Street Journal*, October 21, 2011
- Guest, “Should States be Allowed to Declare Bankruptcy?” Fox News segment, January 31, 2011
- Guest, “Government Regulation of Executive Compensation,” Atlantic Television Network segment, August 2009

## Insights

- Contributor, “Doing Business 2016: Measuring Regulatory Quality and Efficiency”, 13th ed. *World Bank Group*, October 27, 2015.
- Co-author, “When Your Oil And Gas Operator Goes Bankrupt,” *Law360*, June 4, 2012
- Co-author, “Case Study: Jefferson County,” *Law360*, January 23, 2012
- Co-author, “Restructuring Municipalities: A Primer for the Potentially Approaching Storm,” *The National Law Journal*, February 21, 2011
- Co-author, “Healthcare Cases—Get Thee to a Specialist, Stat,” *The Bankruptcy Strategist*, November/December 2008
- Author, “After Takeover Comes the Hard Part,” *The Atlanta Journal-Constitution*, September 2008
- Co-author, “Enhancing Value Without US Tax Consequences Through Restructuring,” *White & Case Global Tax Report*, September 2008
- Co-author, “Foreign Debtors Beware! Globopar Recognizes That You May Be Hauled into a US Bankruptcy Case Involuntarily,” *American Bankruptcy Institute Journal*, March 2005
- Co-editor, *Health Care Insolvency Manual*, 2nd Edition, American Bankruptcy Institute, 2005
- Contributing author, *Mid-Atlantic Institute on Bankruptcy and Reorganization Practice*, 1996 – 2001

## Activities and Affiliations

### Presentations

- Speaker, “Eye on Bankruptcy Series,” American Bankruptcy Institute, December 2017
- Moderator, “Puerto Rico, ‘Super Chapter 9’ and the Future of Sovereign Debt: A Canary in a Coal Mine?” ABI Winter Leadership Conference, Rancho Palos Verdes, CA, December 2, 2016.
- Presenter and Panelist, “A Walk Through P.R.O.M.E.S.A . and the Detroit Experience,” 1st PROMESA Conference, Puerto Rico Chamber of Commerce, San Juan, PR, August 31, 2016.
- Event Moderator and Panel Moderator, “Creative Solutions for Financially Challenged Municipalities,” Municipal Restructuring and Reform Series, Dentons US LLP, New York, NY, October 29, 2015.
- Presenter, “The Insolvency of Government Bodies,” International Association of Insolvency Regulators - The World Bank, Washington, DC, September 10, 2014.
- Moderator, “Evolving Labor Issues in Chapter 11,” ABI webinar, May 23, 2012.
- Speaker, “Intercreditor Issues in Complex Bankruptcies,” ABI 30th Annual Spring Meeting, National Harbor,

# Areas of focus

## Practices

- Banking and Finance
- Litigation and Dispute Resolution
- Real Estate
- Restructuring, Insolvency and Bankruptcy

## Industry sectors

- Financial Institutions
- Government
- Infrastructure and PPP
- Life Sciences and Health Care
- Energy

# Education

- George Washington University School of Law, 1992, JD, with Honors
- New York University, 1987, BA, *cum laude*

# Admissions and qualifications

- District of Columbia
- Washington
- US Bankruptcy Court for Maryland
- US Court of Appeals for the District of Columbia Circuit
- US Court of Appeals for the Fourth Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Federal Claims
- US District Court for the District of Columbia
- US District Court for the District of Maryland
- US District Court for the Eastern District of Virginia
- US District Court for the Western District of Virginia
- US District Court for the Western District of Washington

# Claude D. Montgomery

## Partner



Partner

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## Overview

Claude D. Montgomery is a partner in Dentons' New York office and a member of the Restructuring, Insolvency and Bankruptcy practice group. He has been a member of the Global Executive and Compensation Committees and is the legacy past managing partner of the New York Office. He was also the global head of the Reorganization, Restructuring, and Insolvency practice group at Salans LLP and a member of its Global Banking and Finance group.

Claude is "acclaimed as 'a highly skilled lawyer and a great case manager'" by *The Legal 500 US*. He is an experienced litigator at both the trial and appellate level, and specializes in business reorganizations and municipal restructurings. His business reorganization clients include lenders; debtors; official Chapter 11 and Chapter 9 creditor and retiree committees, and chapter 11 equity committees; indenture trustees; Chapter 7 and 11 trustees; asset buyers; and committees of corporate directors and officers. His hotel industry clients have included owners, operators, leasees and franchisees of hotel properties.

## Experience

- Represented the Official Retiree Committee in Detroit, Michigan's Chapter 9 municipal debt adjustment proceedings. This representation was honored by *The M&A Advisor* with the 2014 "Restructuring of the Year" Award.
- Represented the Fiscal Agency and Financial Advisory Authority (AAFAF) for the Commonwealth of Puerto Rico in its restructuring advice prior to Commencement of Title III proceedings under PROMESA by the U.S. President's appointed Financial Oversight and Management Board of Puerto Rico.
- Represented the Official Retiree Committee for Allis-Chalmers Corporation in its ground breaking multi-national Chapter 11 reorganization case.
- Represented Gibson Brands Inc. as Special Overseas Insolvency Coordinating Counsel in Chapter 11 reorganization case.
- Representing Japanese mobile device manufacturer in restructuring Swedish law contract with distressed multinational logistics company with relevant operations in the Czech Republic, Netherlands, Singapore and the United States.

- Representing Hong Kong based retailer distributor in Nine West Chapter 11 reorganization case.
- Representing Hong Kong energy company in Transmeridian Exploration reorganization case as bondholder, disputed creditor and competing Chapter 11 buyer for Kazakhstan assets
- Representing Russian space technology company in Sea Launch US reorganization case as investor and technology supplier
- Representing China joint venture fund liquidator in fraud investigation of US manager
- Representing two Scandinavian Banks regarding Lehman Brothers in the US Reorganization and UK and Swiss Administration cases as creditors and OSLA and ISDA counterparties.
- Representing a Scandinavian Bank regarding enforcement of Master Whole Loan Repurchase Agreement from Chapter 11 seller
- Representing a Scandinavian Bank regarding restructuring secured hotel/condominium projects
- Representing the Turkish SDIF in insolvency planning relating to pursuit of assets of shareholders involved in a bank fraud
- Representing Telsim Telekomunikasyon by appointment from Turkish SDIF in Motorola v. Telsim regarding enforcement of Swiss Arbitration Award
- Representing Caribbean hotel and casino developer in debt work and partnership restructuring
- Representing Scandinavian bank in liquidity facility workout and structured finance termination
- Recent reorganization and bankruptcy cases: Verity Health Systems of California, Inc. (Debtors' prepetition debt restructuring and DIP financing counsel); Gibson Brands, Inc. (Debtors' Special Coordinating Overseas Insolvency Counsel); Nine West (Hong Kong retailer and Asia Distributor); SunEdison (UK joint venture purchaser of Spanish solar energy generation business) Sea Launch Company (investor and technology supply creditor); Transmeridian Exploration (Bondholder and potential asset purchaser); Lehman Brothers (ISDA and repurchase agreement creditors); Christian Bernard (parent company); Collins & Aikman (Supplier); Atlantic Gulf Communities Corp. (Lender Group); Owens Corning (Lender); Adelphia Communication (Lender); MSCP Holding (Equity Committee); Key3Media (Committee Member); Regal Cinema (Indenture Trustee); Pillowtex (Indenture Trustee); Cellnet (Indenture Trustee)
- Select litigation experience: Boeing v. Energia Logistics (C.D. Cal.); In re City of Detroit (B.E.D. Mich.); Uzan v. Vodafone (N.Y. Sup. Ct.); Uzan v. Telsim (N.Y. Sup. Ct.); Oxus Gold v. Barbanel (D. N.J.); Hechinger v. GECC (D. Del.); Eden Toys v. Miller (B.S.D.N.Y.); Renaissance Cruise Lines v. Flosse (B.M.D. Fla.); Cohen v. Forman (B.S.D.N.Y.); 800 Canal Street v. Sonesta (Arbitration); Dunes Hotel Assoc. v. Hyatt (Arbitration)
- Recent mediation experience: Ames Dept. Stores (B.S.D.N.Y.) (preference cases)

## Recognition

### Honors and Awards

- Recommended by *The Legal 500 US* (2015-2016)
- Co-led team recognized by *The M&A Advisor's* 2014 Restructuring of the Year Award (City of Detroit Chapter 9)
- Recognized with the Martindale-Hubbell AV Preeminent Rating, Martindale-Hubbell's highest ranking in both legal ability and ethical standards (1995-2015)
- Led team recognized by *The M&A Advisor* 2011 Distressed Turnaround Cross Border Transaction of Year (Sea Launch Chapter 11)

- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 74 of 1318
- Recognized for Bankruptcy in *Super Lawyers* magazine (2006-2018)
  - AV Preeminent rating by Martindale-Hubbe (2013-2018)

## Insights

- "Dentons advises Gamma Energy on Stokes Marsh solar PV acquisition," *Dentons client alert*, May 19, 2017
- Co-author, "Puerto Rico: Is the Sovereign in or out of the Dollar Zone?," *Eurofenix*, Autumn 2015
- "New Developments: Plan Process - Voting and Conformation," *Current Bankruptcy Developments*, Practicing Law Institute, 2001
- "Solicitation Under Section 1125 of the Bankruptcy Code: Century Glove and the First Amendment," *Seton Hall Law Review*, 1993
- "The Impact of the Collective Bargaining Agreement On The Corporate Reorganization Process in Chapter 11 of the Bankruptcy Code," *Labor Law Development*, 1985
- "Rejection of Collective Bargaining Agreements During Chapter 11 Proceedings Under the U.S. Bankruptcy Code," Practicing Law Institute, ERISA and Bankruptcy, 1983

## Activities and Affiliations

### Presentations

- Panel Member, ABA Business Bankruptcy Committee, "Municipal Insolvencies in the Aftermath of Puerto Rico," National Conference of Bankruptcy Judges, San Antonio, TX, 2018
- Panel Member, "I Spy and the Limits of Private Investigation for Lawyers" INSOL Europe, Athens, Greece, 2018
- Panel Moderator, "Creative Solutions for Financially Challenged Municipalities," Municipal Restructuring and Reform Series, Dentons US LLP, Chicago, IL, November 5, 2015
- Panel Moderator, "Hot Topics, Legal Issues and Uncertainties Surrounding the Rights of Parties in a Municipal Insolvency, Including Chapter 9," Municipal Restructuring and Reform Series, Dentons US LLP, New York, NY, October 29, 2015
- ACB Fifth Circuit Panel on Chapter 9 municipal bankruptcy and restructuring, Seminar co-hosted by United States Court of Appeals for the Fifth Circuit and the American College of Bankruptcy, New Orleans, May 2014
- Panelist, "Obamanomics and the Future of Bankruptcy Judges," National Conference of Bankruptcy Judges, Las Vegas, October 2009
- International Society of Hospitality Consultants, Budapest, 2001
- Association of the Bar of the City of New York, New York, 1993
- Pacific Coast Labor Law Symposium, Seattle, 1989
- Practicing Law Institute, New York, 1983; San Francisco, 1986; New York, 1994; New York, 2001
- American Bar Association, Labor Section, Chicago, 1985
- AFL-CIO Lawyers Conference, 1981, 1982, 1986

- International Insolvency Institute, Member
- American Bankruptcy Institute, Member
- INSOL Europe, Member
- International Society of Hospitality Consultants, Member (1995-2016)
- American Bar Foundation, Member
- American Bar Association, Member
- Committee on Bankruptcy and Corporate Reorganization, Association of the Bar for the City of New York, Member (1991–1993)

## Prior and Present Employment

Claude joined Salans (now Dentons) from Phillips Lytle Hitchcock Blaine & Huber where he was a member of the Governing Committee. He is a past Vice Chair of the Ethics Subcommittee for the ABA Business Bankruptcy Committee, Business Law Section and a past Vice-Chair and Chair of the European Working Group for the International Bankruptcy Subcommittee 2002-2004. Claude was also Vice-Chair of the Avoiding Power Subcommittee, ABA Business Bankruptcy Committee, Business Law Section from 1997-1999.

## Areas of focus

### Practices

- Banking and Finance
- Litigation and Dispute Resolution
- Restructuring, Insolvency and Bankruptcy
- Cross-Border Restructuring Matters
- Distressed M&A, Investing and Debt Trading
- Financial Institution Insolvency
- Insolvency Litigation and Enforcement

### Industry sectors

- Aviation and Aerospace
- Commercial Banks
- Hotels
- Investment Banks and Broker Dealers

## Education

- Stanford University, 1978, JD
- Brown University, 1975, BA, double major in History and Economics

# Admissions and qualifications

- Michigan
- New York
- US Court of Appeals for the District of Columbia Circuit
- US Court of Appeals for the First Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Second Circuit
- US Court of Appeals for the Sixth Circuit
- US Court of Appeals for the Third Circuit
- US District Court for the District of Connecticut
- US District Court for the Eastern District of Michigan
- US District Court for the Eastern District of New York
- US District Court for the Southern District of New York
- US District Court for the Western District of Michigan
- US Supreme Court



# Andrea Sharetta

## Partner

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## Overview

Andrea Sharetta is a member of Dentons' Tax practice. She has expertise in federal income tax matters, including taxable and tax-free mergers, acquisitions, dispositions and other restructurings; bankruptcy and insolvency reorganizations; taxation of consolidated groups of corporations; and corporate joint ventures, with a concentration on cross-border tax planning and taxation of nonresidents.

Andrea has experience in a broad range of US tax issues for multinational corporations and regularly provides advice on international tax matters, including business structuring, sourcing, the subpart F provisions, the foreign tax credit provisions, tax treaties, and the tax treatment of both inbound and outbound investments.

Andrea actively participates in the firm's pro bono program and has helped a variety of nonprofit groups obtain federal and state tax exemptions. She is also a regular contributor to Dentons' Tax practice E-Alerts.

## Recognition

### Honors and Awards

- Ranked, *The Legal 500 US*, International Tax, 2020

## Insights

- Co-author, "Income tax consequences of US visas," June 24, 2015

## Activities and Affiliations

### Memberships

- Member, Tax Section, New York State Bar Association

## Areas of focus

### Practices

- Corporate Taxation
- Individual Taxation
- Tax
- Banking and Finance Taxation

## Education

- New York University, 1998, LL.M., Taxation
- University of Notre Dame, 1997, JD, *Notre Dame Law Review*
- Binghamton University, 1994, BA, *summa cum laude*

## Admissions and qualifications

- Illinois
- New York

# Oscar N. Pinkas

## Partner



Partner

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## Overview

Oscar is a Global Leader in Dentons' Restructuring, Insolvency & Bankruptcy practice. He represents clients in and out of court in underperforming, distressed, workout, receivership, insolvency and bankruptcy situations involving strategic, operational, or financial issues, with an emphasis on M&A, equity or debt financing transactions.

Clients include investors, purchasers, lenders/agents, indenture trustees, estate fiduciaries, committees and debtors. As a result of his multi-faceted practice, Oscar is able to anticipate and navigate the interests of competing constituencies for the benefit of clients. Known for his creativity, ability to execute and practicality, Oscar is frequently called upon by clients in situations that are unique, sensitive or complex. Clients describe him as an "out of the box thinker" and a "pleasure to work with," guarding their interests at every turn.

Oscar has received several accolades, including being named a 40 Under 40 Leader in Insolvency by the *American Bankruptcy Institute*, an Emerging Leader in M&A, Financing and Turnaround by *The M&A Advisor*, a Top 50 Rising Star Dealmaker in the Americas by *Global M&A Network*, a Top Rated Bankruptcy Attorney by *Super Lawyers*, and a Top Attorney Under 40 by *Bankruptcy Law360*. Restructurings or transactions he has been at the center of have received equal praise as Out of Court Restructuring of the Year or Cross-Border Turnaround of the Year by *Global M&A Network's Turnaround Atlas Award*, and M&A Deal of the Year, Restructuring Deal of the Year or Industry Deal of the Year by *The M&A Advisor*.

## Experience

Cases and matters Oscar has been heavily involved in include: Accuride, ATP-UK, bebe stores, CIT Group, Fontainebleau, Gasfrac Energy, Global A&T Electronics, Lehman Brothers, Magnetation, Mesabi Metallics, Movie Gallery, NewComm Wireless, Ranger Offshore, Refco, Sanjel, Sea Containers, Toys "R" Us, Tropicana Entertainment, Walter Energy, Westpoint Home and Young Broadcasting. Representative engagements are below.

### Investor

- Automotive: Represented purchaser in take-private transaction that closed simultaneously with a recapitalization, new financing and introduction of a new management team.

- Maritime: Represented purchaser in acquisition of barge fleet through an out of court restructuring. A consensual deal was obtained after acquiring a large stake in defaulted debt of the seller.
- Mining: Represented purchaser in acquisition of assets with a book value of \$750 million from mining company.
- Mining: Represented investor in acquisition of equity interest in mining company as part of a restructuring that discharged over US\$3.5 billion of debt.
- O&G: Represented purchaser in acquisition of liquefied petroleum fracking company for US\$100 million.
- Financial Services: Represented purchaser of US\$500 million of non-performing loans and REO properties.
- Financial Services: Represented acquiror of insolvent partner's interest in joint venture concerning MSRs.
- Hotel/Leisure: Represented investor in acquisition of controlling interest in casino enterprise valued in excess of US\$1 billion as part of restructuring that discharged over US\$2.4 billion of debt.
- Financial Services: Represented acquiror of equity interest in commercial lender with over US\$65 billion of assets.
- Real Estate: Represented investor in acquisition of stalled US\$2 billion hotel construction project.

## Lender

- Financial Services: Represented hedge fund in six separate lending transactions to financial services companies.
- Retail: Represented lending syndicate in bridge financing to keep company out of bankruptcy and effectuate its restructuring to an online platform.
- O&G: Represented lending syndicate that received paydown of first-lien debt in restructuring and recapitalization of frac sand production company.
- Financial Services: Represented lenders with exposure to troubled servicer of residential and commercial loans.
- Real Estate: Represented debtor-in-possession lender in financing to fund bankruptcy proceeding of real estate development, which enabled a sale of the development for over US\$150 million.
- Hotel/Leisure: Represented lender in US\$150 million exit financing facility to consummate restructuring.

## Indenture Trustee/Collateral Agent

- Retail: Representing DIP indenture trustee as foreign counsel across multiple European countries and Australia, including coordinating recovery on US\$455 million of notes in insolvency filings in several of those countries.
- Manufacturing: Represented indenture trustee as global counsel in the US, Europe and multiple Asian countries in issuance of US\$665 million of notes upon consummation of prepackaged plan of reorganization.
- Trust Services: Represented corporate trust services provider in sale of a portion of its trust business.
- Retail: Represented indenture trustee of jewelry store operator. Despite liquidation, bondholders were paid in full.

## Cross-border

- Mining: Represented purchaser in the acquisition and restart of mines previously acquired for US\$3 billion. Since that time, all three mines have reopened, original investors took a large paydown in a partial exit, and

- O&G: Represented purchaser in US\$150 million cross-border acquisition of cementing and fracturing operations.
- O&G: Represented purchaser in US\$100 million cross-border acquisition of fracturing operations.
- Oilfield Services: Represented Canadian receiver of drilling services and equipment rental company in asset sale.
- O&G: Represented UK administrator of oil and gas producer regarding substantial claims against US affiliates.
- Financial Services: Represented German administrator regarding over US\$8 billion of claims against US affiliates.

## Creditor and Equity Committees

- Automotive: Represented equity committee of manufacturer and supplier of commercial vehicle components. Waged a successful valuation fight, resulting in the issuance of warrants to equity holders.
- Shipping: Represented UK pension on official pensioners' committee in contested restructuring. Enhanced pensioner recoveries through issuance of Financial Support Directions creating joint and several liability of the debtors, the first ever issued by The Pensions Regulator of the United Kingdom.
- Manufacturing: Represented creditors' committee of manufacturer of electric generators and air compressors.

## Company/Debtor

- TMT: Represented radio broadcast companies in their successful restructuring of over US\$800 million of debt. Highest value was obtained by terminating exclusivity and submission of competing plans of reorganization.
- Insurance: Represented reinsurance brokerage in extended negotiation of forbearance. As a result of extended negotiations, company was able to negotiate a reduced loan payment and sell assets to payoff the lender.
- TMT: Represented debtor in restructuring involving sale of substantially all assets that resulted in full payment to creditors and a significant recovery to equity holders.

## Litigation

- Financial Institutions: Represented non-profit educational institution as defendant in litigation concerning the propriety of termination of interest rate swaps. Settled without admission of liability for nuisance value.
- Textiles: Represented purchaser in three litigations by second-lien lenders seeking majority of equity in the enterprise. Prevailed in all three litigations.
- Hotel/Leisure: Represented companies in litigation over ownership of trademarks they were operating under. Settled without admission of liability and retained ownership of trademarks for the companies' operations.

# Recognition

## Honors and Awards

Oscar has received several accolades for his accomplishments:

- "Outstanding Young Restructuring Lawyer", *Turnarounds & Workouts*

- "40 Under 40" Leader in Insolvency, *American Bankruptcy Institute*
- Emerging Leader in M&A, Financing and Turnaround, *The M&A Advisor*
- Top 50 Rising Star Dealmaker in the Americas, *Global M&A Network*
- Top Attorney in Bankruptcy, *Super Lawyers*
- Top Attorney Under 40, Bankruptcy, *Law360*
- Top 12 Young Restructuring Lawyer, *Turnarounds & Workouts*

Restructuring, M&A or lending transactions Oscar has been at the center of have also received several accolades:

- "M&A Deal of the Year (\$75M - \$100M)," *The M&A Advisor*
- "Distressed M&A Deal of the Year (Mid-Market)," *Global M&A Network Americas M&A Atlas Award*
- "Cross-Border Turnaround of the Year," *Global M&A Network's Turnaround Atlas Award*
- "Out of Court Restructuring of the Year," *Global M&A Network's Turnaround Atlas Award*
- "Restructuring Deal of the Year," *The M&A Advisor*
- "Materials Deal of the Year," *The M&A Advisor*
- "Consumer Discretionary Deal of the Year," *The M&A Advisor*
- "Community Impact Deal of the Year," *Global M&A Network's Turnaround Atlas Award*

## Insights

Oscar stays current on developments in his areas of expertise. As a result, he is frequently sought out for commentary on cases or hot topics, and regularly speaks on panels regarding them. He also frequently publishes articles on the impact of significant changes in the law, including over 20 articles in the *ABI Journal*, the *New York Law Journal*, *Law360*, *ABF Journal* and *Private Debt Investor*.

## Activities and Affiliations

### Memberships

- ABI, ABA, AIRA, INSOL and TMA-NYC
- Member of an Advisory Board of the ABI
- Co-Chair of the ABA's Committee on Business Transactions
- Member of the Host Committee for the 9th Annual Resolve Gala. Resolve is a not for profit that provides grants to young entrepreneurs in social ventures that span the globe (73 countries) so that they can help millions of people.

### Prior and Present Employment

- Prior to joining Dentons, Oscar served as judicial clerk to the Hon. Donald H. Steckroth, US Bankruptcy Judge for the District of New Jersey (Ret.)

## Areas of focus

- Cross-Border Restructuring Matters
- Distressed M&A, Investing and Debt Trading
- Finance
- Insolvency Litigation and Enforcement
- Mergers and Acquisitions
- Out-of-Court Restructurings and Work-outs
- Restructuring, Insolvency and Bankruptcy

## Industry sectors

- Hedge Funds
- Private Equity

## Education

- Seton Hall University School of Law, 2006, JD, Publishing member, *Seton Hall Journal of Sports and Entertainment Law*
- Solvay Business School, Université Libre de Bruxelles (ULB), 2002, MBA, with honors
- Rollins College, 2001, BA, Economics

## Admissions and qualifications

- Florida
- New Jersey
- New York
- US District Court for the District of New Jersey
- US District Court for the Eastern District of New York
- US District Court for the Southern District of New York

# Robert B. Millner

## Senior Counsel



Senior Counsel

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## Overview

Robert Millner practices in bankruptcy and commercial litigation. Ranked in *Chambers USA* since 2004, (Bankruptcy/Restructuring—Illinois), Robert is noted as “highly regarded by clients and peers, who say: ‘He is one of the most intelligent, far-seeing and academic attorneys I’ve ever met. He’s a brilliant person.’”(2017); (“accomplished in handling matters for clients in the insurance sector...his work is excellent.”) (2019).

Among other things, he represents financial institutions and insurance companies in significant bankruptcy litigation and lenders and debtors in complex real estate matters.

Robert is a frequent lecturer at major seminars and is author of numerous articles and papers on bankruptcy topics.

## Experience

- Robert’s representations include the Official Committee of Unsecured Creditors in the Federal Mogul bankruptcy in Delaware, and insurance carriers in several Catholic Church bankruptcies, and in the USA Gymnastics chapter 11 case pending in Indianapolis, Indiana.
- Robert has also represented insurance carriers in most of the major asbestos-related bankruptcies filed in the United States in the last decade, most recently in *In re: Budd Company* and *In re: Oakfabco*, in the Northern District of Illinois, in *In re The Fairbanks Company*, in the Northern District of Georgia.
- Robert has also represented a principal energy-contract counterparty in Enron in New York, significant landlords in retail and commercial bankruptcies, including the landlord in the Stonebridge bankruptcy (where the United States Court of Appeals for the 5th Circuit clarified letter of credit rights), major parties in interest in the SNTL bankruptcy (where the United States Court of Appeals for the 9th Circuit clarified guarantor rights), and the former chairman of the Board of Fruit of the Loom in Delaware.
- Robert has restructured a vast amount of mortgage debt on behalf of lenders to single-asset entities, and was counsel for the principal secured lender in the Carter Hawley Hale bankruptcy in Los Angeles, which involved a highly complex real estate restructuring, and was counsel for the same lender in other significant restructurings.
- Robert has handled cross-border matters both on the debtor side (representing a US flag carrier whose



# Recognition

## Honors and Awards

- Ranked in Illinois for Bankruptcy/Restructuring by *Chambers USA* (2004-2019)
- Ranked by *The Best Lawyers in America* for Bankruptcy and Creditor Debtor Rights/Insolvency and Reorganization Law and Bankruptcy Litigation (2019-2020)
- Ranked in *Legal Leaders*’ “Chicago’s Top Rated Lawyers” for Bankruptcy and Commercial Litigation
- Recognized for Bankruptcy in *Super Lawyers* magazine

## Insights

- Author of numerous other articles and papers, available on request.
- *Insurance Issues in Bankruptcy*. A Collier Monograph, Lexis Nexis, 2014

## Activities and Affiliations

### Memberships

- American Bar Association
  - Chair, Mass Tort Subcommittee, Business Bankruptcy Committee
  - Co-chair, Bankruptcy and Insolvency Committee, Litigation Section, 1992 – 1995, 2001 – 2004
  - Former Chair, Bankruptcy Insurance Committee
  - Former Vice-Chair, Task Force on Current Developments in Bankruptcy, Business Law Section
  - Vice-Chair, Joint Ad Hoc Committee on Bankruptcy Court Structure and Insolvency Process, 1993 – 1997
- Fellow, American College of Bankruptcy; Chair, International Committee
- Life fellow, American Bar Foundation
- Member, International Insolvency Institute
- Honorary overseas member, Commercial Bar Association, London

### Prior and Present Employment

Robert served as law clerk to the late George C. Edwards of the United States Court of Appeals for the Sixth Circuit (1975 – 1976).

## Areas of focus

- Capital Markets
- Corporate Governance
- Litigation and Dispute Resolution
- Mergers and Acquisitions
- Real Estate
- Restructuring, Insolvency and Bankruptcy

## Industry sectors

- Financial Institutions
- Insurance

## Education

- University of Chicago, 1975, JD, Member, *University of Chicago Law Review*
- Wesleyan University, 1971, BA, *magna cum laude*; Phi Beta Kappa

## Admissions and qualifications

- Illinois
- US Court of Appeals for the Fifth Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Seventh Circuit
- US Court of Appeals for the Sixth Circuit
- US Court of Appeals for the Third Circuit
- US District Court for the Eastern District of Wisconsin
- US District Court for the Northern District of Illinois
- US District Court for the Northern District of Illinois, Trial Bar
- US Supreme Court

# Arthur H. Ruegger

## Senior Counsel



Senior Counsel

New York

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## Overview

Arthur Ruegger is a member of Dentons' Restructuring, Insolvency and Bankruptcy practice. He practices in bankruptcy litigation, commercial litigation, securities litigation and arbitration.

Art has extensive experience in bankruptcy court adversary proceedings and other contested matters, securities regulatory proceedings, securities arbitrations, and a wide variety of commercial litigation in the federal and state courts. Art's areas of substantive concentration include avoidance actions; valuation contests; securities fraud; general securities law work, including broker/dealer regulation; and contract and corporate law.

## Experience

### Representative Experience

Art has represented numerous entities and individuals, including debtors, creditors, committees and financial advisors, in a variety of high-profile bankruptcy cases and related litigations, including:

- **City of Detroit, Michigan** (Bankr. E.D. Mich.): as part of the restructuring and litigation teams, represented the Official Committee of Retirees, with contested hearings on eligibility and restructuring.
- **Lehman Brothers v. Saint Louis University** (Bankr. S.D.N.Y.): leader of the team defending Saint Louis University in matters related to the termination of interest rate swaps.
- **In re Federal Mogul** (Bankr. D. Del.): part of the team representing the Official Committee of Unsecured Creditors in this asbestos-related auto parts manufacturer's reorganization.
- **Westpoint Stevens** (Bankr. D. Del.): part of the team defending the asset sale in bankruptcy
- **Wave Division Holdings v. Highland Capital and Trimaran Capital** (Del. Chancery and Supreme Court): leader of the team defending Trimaran Capital Management in this contract and tort claim litigation.
- **Refco** (Bankr. S.D.N.Y.): leader of team representing estate administrator in various litigation and arbitration matters.

In addition, Art has represented various financial advisors as valuation and other expert witnesses, including the related document productions, depositions and hearing testimony, in a number of high-profile restructurings, including:

- Adelphia
- BearingPoint
- Capmark
- Charter Communications
- Chemtura
- Dynegy
- Exide Technologies
- Extended Stay
- Hawaiian Telecom
- Hayes Lemmerz
- Horsehead Holding
- Indianapolis Downs
- Smurfit Stone
- Tribune
- Tropicana

## Activities and Affiliations

### Presentations

- Speaker, "Taking and Defending Depositions," National Association of Chapter Thirteen Trustees Annual Seminar, August 2013

## Areas of focus

### Practices

- Commercial Litigation
- Financial Services Litigation
- Insolvency Litigation and Enforcement
- Litigation and Dispute Resolution
- Restructuring, Insolvency and Bankruptcy

### Industry sectors

- Global Financial Services Firms

## Education

- Fordham University, 1977, JD, *cum laude*
- Georgetown University, 1974, AB, *cum laude*

## Admissions and qualifications

- New York
- US Court of Appeals for the Fourth Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Second Circuit
- US District Court for the Eastern District of Michigan
- US District Court for the Eastern District of New York
- US District Court for the Southern District of New York

# Stephen D. Libowsky

## Partner



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## Overview

Stephen Libowsky is a member of Dentons' Litigation and Dispute Resolution practice and head of the Firm's US Competition and Antitrust practice. Stephen has had numerous successes in trials and appeals, counseling clients on a wide range of antitrust and competition issues, and navigating deals through the United States Department of Justice (DOJ) Antitrust Division, the Federal Trade Commission (FTC) and competition agencies in the US and globally.

Stephen has a broad range of experiences counseling and litigating matters. His antitrust experiences include grand jury and internal investigations, mergers and acquisitions, joint ventures, relationships with competitors, distribution, pricing, and unfair competition matters. He has represented clients before numerous state and federal courts, and in proceedings before arbitration panels, the Department of Justice, the Federal Trade Commission and grand juries. Stephen has tried antitrust cases to verdict for clients as both a plaintiff and as a defendant. He has represented clients in multidistrict antitrust civil and criminal proceedings and has counseled clients on antitrust issues in many industries and sectors, including automobile, agribusiness including cannabis, energy, entertainment and media, health care, information systems, life sciences, manufacturing, music, pharmaceuticals, sports, steel, technology, among others.

Stephen has also tried and litigated employee trade secret, covenant not to compete, unfair competition and contract matters. He has counseled and represented businesses, consultants and professionals with respect to the Employee Retirement Income Security Act (ERISA) and the insolvency of entities issuing or guaranteeing plan benefits and has advised clients in financial and business matters on an array of issues, including in bankruptcy, restructuring and insolvency proceedings.

He has advised professional firms on alleged negligence, breach of fiduciary duties, and conflicts of interest. Stephen served as Associate General Counsel of his two prior law firms, handling litigation, conflicts, internal investigations, and professional responsibility matters. Stephen was a member of the Ethics/Professional Responsibility Committees at each of these firms, serving as Chairman from time to time, and has testified numerous times as an expert witness on professional responsibility and ethics matters.

Stephen's pro bono practice is extensive and regularly involves many of today's cutting-edge civil rights and liberties issues. Stephen is a past President of the Public Interest Law Initiative (PILI) and has been on the PILI Board of Directors for over 25 years.

# Experience

## Competition and antitrust

- **Hart-Scott-Rodino filings:** Stephen has handled hundreds of Hart-Scott-Rodino (HSR) filings in every imaginable industry and sector, including responding to formal and modified Second Requests from DOJ and the FTC. He has negotiated resolution of antitrust issues on transactions allowing them to proceed and close. Many of these transactions involved using economic and financial experts, drafting “white papers” and other materials, and presenting witnesses to persuade the DOJ or FTC to allow the transaction to proceed. He has also represented dozens of witnesses in agency investigations or at merger trials challenging transactions by DOJ or the FTC, has followed many merger trials on behalf of interested parties and investors, and has represented several clients in merger trials directly.
- **Matsuo Electric:** In the Capacitors Antitrust Litigation, cases involving several class actions in the United States, multiple worldwide investigations, and grand jury and criminal proceedings in the Northern District of California. Stephen served as lead counsel in the criminal penalty phase trial in 2018, resulting in a substantial downward departure from the sentencing guidelines. He also wrote the new antitrust compliance plan for Matsuo—one of the first approved by the DOJ under its new guidelines.
- **Southwire Company:** Represented the country's largest cable wire manufacturer and distributor in its acquisition of United Copper, the third-largest manufacturer and distributor of copper wire cable. Prior to filing the HSR materials, Stephen, along with retained economic consultants, drafted appropriate “white papers,” prepared Second Request materials, and prepared senior management for interviews so that expedited communications with and production of a substantial amount of documents and information to the FTC could occur. Within six weeks after the HSR was filed, he convinced the FTC that no adverse competitive effects would occur, and the transaction was not challenged.
- **Molex Corporation:** HSR advice and worldwide competition filings in its \$7.2 billion sale to Koch Industries. In addition to advising on antitrust issues, conducted analysis on whether to make competition filings in over 50 countries, made competition filings in 16 countries, and managed the process to allow for a timely year-end closing.
- **US subsidiary of worldwide auto parts manufacturing company:** Led a team in responding to the United States Department of Justice's grand jury subpoena to in the *Automotive Antitrust Litigation*. After extensive discovery proceedings, including submission of several million documents and lengthy interrogatory responses and multiple proof proffers, no action was taken against client.
- **Wyeth:** Defended pharmaceutical company and served as liaison counsel for all manufacturer defendants in more than 200 consolidated antitrust actions alleging price-fixing and price-discrimination on every brand name prescription drug sold in the US. The cases involved a class of over 40,000 retail pharmacies alleging price-fixing claims and thousands of chain store and individual retail pharmacies alleging price-fixing and price-discrimination. These consolidated cases are purported to be the largest civil action ever brought to the US court in terms of pleadings and discovery and raised novel substantive, procedural and logistical issues. After a 10 week trial, a directed verdict for defendants was granted and affirmed on appeal.
- **Chicago Bulls:** Represented the Chicago Bulls in *Chicago Professional Sports Ltd. Partnership v. NBA*, 961 F.2d 667 (7th Cir.), *cert. denied*, 506 U.S. 954 (1992), where the Bulls successfully challenged as anticompetitive the NBA's limit on the number of games teams could sell to TV superstations in a case tried to verdict seven weeks after the complaint was filed. The US Court of Appeals for the Seventh Circuit affirmed, and the Supreme Court denied certiorari. Further attempts to limit and prohibit superstation telecasts were later challenged and found unlawful in a nine-week trial. 874 F. Supp. 858 (N.D. Ill. 1995). After further proceedings, the parties settled and confirmed the Bulls' right to raise the number of telecasts on WGN to an all-time high. 95 F.3d 593 (7th Cir. 1996)
  - Represented the Chicago Bulls in *NBA v. Williams*, 857 F. Supp. 1069 (S.D.N.Y. 1994), *aff'd*, 45 F.3d 684 (2d Cir. 1995), *cert. denied*, 116 S. Ct. 2456 (1996), at trial and in the Second Circuit and obtained a ruling that NBA players could not use the antitrust laws to challenge restraints on

- Represented the Chicago Bulls and obtained a summary judgment of dismissal in an antitrust action against the Bulls and the other NBA clubs challenging the prohibition of a "one-on-one" contest between Michael Jordan and Earvin "Magic" Johnson. 853 F. Supp. 333 (C.D. Cal. 1994).

- **Health care industry:** Represented health care companies and other entities in the health care industry around the country on a variety of antitrust issues, including issues concerning joint ventures and operating arrangements, mergers, affiliations, reimbursement matters, peer review, ancillary businesses alleged to involve monopoly leveraging and managed care matters. While many of these matters involved transactions and resolving disputes, several have been successfully arbitrated to decision before three member arbitration panels.

## Complex business litigation

- **Mutual Benefit Life:** In the largest life insurance company insolvency in United States history, the Rehabilitator of Mutual Benefit Life Insurance Company (MBL) sought to terminate contracts with Stephen's client, the developer and administrator of corporate-owned life insurance products. Following a successful combination of business and litigation strategies, including an expedited trial, Stephen negotiated a settlement in which his client received \$50 million in cash, a new administration agreement worth \$125 million, and a nearly \$150 million unsecured claim, making him the largest unsecured creditor. After winning a lengthy trial, the unsecured creditors received the excess surplus and the capital stock of the successor to MBL. At the final resolution, his client had received over \$400 million and reimbursement of the attorneys' fees and expenses.
- **Research In Motion Limited (RIM):** Represented software company in multiple matters, including one in which a company purchased by RIM and its officers were sued in Georgia alleging breach of contract, tort, and trade secrets claims. The case involved a claim purchased out of a Norwegian bankruptcy and concerned the wireless technology used to open attachments from BlackBerry devices. Witnesses were located throughout the world, and the case involved the interpretation of multiple computer programs and tens of thousands of lines of source code. After obtaining summary judgment on all tort and contract claims, the trade secrets claim was settled after the court struck portions of and limited the expert testimony of Plaintiff's three experts.
- **Corporate-Owned Life Insurance:** Actively involved in the various issues and proceedings related to corporate-owned life insurance programs. These included government investigations, suits for tax refunds, suits on the validity and tax deductibility, and fraud, misrepresentation, and professional liability suits against issuing insurance companies, brokers, administrators, and professionals.
- **Seagram Company Ltd.:** Represented a beverage company in a contract dispute with Fortune Brands' Jim Beam Brands concerning distribution arrangements in Europe. After Seagram's draft complaint, draft damages study, and draft discovery was sent, the matter settled at the demand amount.

## Recognition

### Honors and Awards

Stephen has achieved an AV rating from Martindale for decades and has been recognized in *Chambers USA* (Antitrust), *Global Competition Review*, *The Best Lawyers In America*, *Illinois SuperLawyers*, *The Leading Lawyers Network*, and *The Legal News Top Lawyers In America* and has been a member of the *Law360* Competition Editorial Board. Stephen has been awarded numerous awards for his pro bono accomplishments, including the Edward Lewis Award from the Chicago Bar Association and the Chicago Bar Foundation and awards from the Seventh Circuit Court of Appeals, the District Court for the Northern District of Illinois, the Illinois State Bar Association, Access Living and others.



- Quoted in "DOJ Antitrust Division Gets Off The Sidelines," *Law360*, February 8, 2019
- Quoted in "What The DOJ's Latest Case Says About No-Poach Policy ," *Law360*, April 10, 2018
- Mentioned in "Don't cross this line: When recruiting turns into poaching," *Business Insurance*, March 6, 2018

## Insights

- Co-author, "US competition law and COVID-19," Dentons client alert, April 1, 2020
- Author, "US antitrust during COVID-19," Dentons client alert, March 26, 2020
- Co-author, "FTC revises Hart-Scott-Rodino thresholds for 2020," Dentons client alert, January 29, 2020
- Co-author, "New DOJ "strike force" targets bid riggers and antitrust violators involved in government procurements," Dentons client alert, November 13, 2019
- Co-author, "'No-poaching" agreement takes center stage in class certification case against backdrop of heightened federal scrutiny," Dentons client alert, February 21, 2018
- Co-author, "FTC testimony underscores agency's views on certificate-of-need laws and competition in health care markets," Dentons Client Alert, February 12, 2018
- Author, "Federal Trade Commission revises Hart-Scott-Rodino thresholds for 2018," Dentons client alert, February 2, 2018
- Co-author, "Dentons' pick of global regulatory trends to watch in 2018," January 24, 2018
- Co-author, "China to amend the merger control regime," Dentons client alert, July 10, 2017
- Co-author, "Federal Trade Commission revises Hart-Scott-Rodino thresholds for 2016," Dentons client alert, February 8, 2016
- Co-author, "US Federal Trade Commission revises Hart-Scott-Rodino and interlocking directorate thresholds for 2015," Dentons client alert, January 16, 2015

## Activities and Affiliations

- *Law360* Competition Editorial Advisory Board, 2015 and 2017

## Community Involvement and Pro Bono

Steve also has an active and extensive pro bono practice that deals with many of today's cutting-edge civil rights and liberties issues. He is a past president of the Public Interest Law Initiative, and he has served on its board of directors for nearly 20 years. He has been recognized for his pro bono accomplishments.

## Presentations

- Presenter, "What's New in Insurance Antitrust," Gotham Insurance Symposium 2019, New York, October 24, 2019
- Speaker, "Antitrust Update For In-House Counsel," American Bar Association Antitrust Section Corporate Counseling Committee, September 17, 2019
- Presenter, "What's New in Insurance Antitrust ," Heartland Insurance Symposium 2019, Kansas City,

- Co-presenter, "What's New and Different in Antitrust in Canada, Europe, the UK and the US Because of Big Data," Dentons CLE Seminar for In-House Counsel, Chicago, June 15, 2018
- Co-presenter, "What's New and Different in Antitrust Under the Trump Administration," Dentons CLE Seminar for In-House Counsel, St. Louis, June 8, 2018 and Washington, DC, October 17, 2018
- Presenter, "Antitrust Analysis in Mergers and Acquisitions: What are the DOJ and FTC up to These Days," Dentons CLE Seminar for In-House Counsel, Chicago, June 8, 2016
- Speaker, "Antitrust Update For In-House Counsel," American Bar Association Antitrust Section Corporate Counseling Committee, July 9, 2014
- Presenter, "Health Care Antitrust: Latest Development and Trends," Dentons CLE Seminar for In-House Counsel, Chicago, June 5, 2014

## Memberships

- American Bar Association
  - Section on Antitrust Law
- State Bar of Georgia
- Public Interest Law Initiative
  - Board member, 1997–present
  - President, 2008–2010
  - Vice president, 2006–2008
  - Treasurer, 2004–2006
- Office of the General Counsel, American Youth Soccer Organization

## Prior and Present Employment

- Law Clerk for the Honorable G. Ernest Tidwell, United States District Court for the Northern District of Georgia.

## Areas of focus

### Practices

- Commercial Litigation
- Competition and Antitrust
- Competition and Antitrust Counseling and Compliance
- Competition and Antitrust Litigation
- Litigation and Dispute Resolution
- Merger Control and Review
- Professional Liability Litigation

- Antitrust Counseling
- Automotive
- Life Sciences
- Life Sciences and Health Care
- Litigation, Arbitration, Mediation and other Dispute Resolution
- Media, Entertainment and Sports
- Professional Liability
- Sports

## Education

- University of Georgia School of Law, 1982, JD, with honors: editorial board, *Georgia Law Review*
- Vanderbilt University, 1979, BA, with honors

## Admissions and qualifications

- Georgia
- Illinois
- US Court of Appeals for the Eleventh Circuit
- US Court of Appeals for the Fifth Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Seventh Circuit
- US District Court for the Northern District of Georgia
- US District Court for the Northern District of Illinois
- US District Court for the Northern District of Illinois, Trial Bar
- US District Court for the Western District of Michigan
- US Supreme Court

# Geoffrey Miller

## Senior Managing Associate



Senior Managing Associate

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## Overview

Geoffrey Miller is a member of Dentons' Restructuring, Insolvency and Bankruptcy practice. He advises debtors, creditors and other significant stakeholders in chapter 11 cases, out of court restructurings and cross-border insolvency proceedings. Among other things, Geoff regularly represents debtors in the healthcare industry as well as private equity funds and other acquirers of financially distressed businesses and loans including in enforcement matters. He also represents insurers and insurance related entities in bankruptcy cases, including in bankruptcy cases arising from mass torts such as asbestos exposure.

## Experience

- **Verity Health System of California, Inc.** (Chapter 11 - Central District of California, August 2018-present): Representing parent not-for-profit company and 16 related entities, including 6 significant operating hospitals, in the second largest hospital bankruptcy case in American history. The firm has already secured court approval of the sale of two hospitals for \$235 million, over the objections of various parties, including the California Attorney General.
- **Astria Health** (Chapter 11 - Washington). Representing Astria Health System in a recent filing of 13 related chapter 11 cases. Located in Yakima, Washington, the health system includes three operating acute care hospitals.
- **Insurance carrier:** Represented an insurance carrier in asbestos-related bankruptcies, *In re: Budd Company* and *In re: Oakfabco*, both in the Northern District of Illinois.
- **Montreal, Maine & Atlantic Railway, Ltd.:** Represented directors & officers and various related entities in the cross-border bankruptcy and insolvency proceedings of *Montreal, Maine & Atlantic Railway, Ltd.*
- **Blueberi Gaming Technologies:** Represented the foreign representative in the chapter 15 insolvency proceedings of *In re: Blueberi Gaming Technologies*.

## Insights

- "Recent Developments Regarding the Interface Between Insurance and Bankruptcy," ABA Section of Business Law, Business Bankruptcy Committee

Main Document Page 97 of 1318

- "Bankruptcy Notice Lessons From Lyondell", Law 360, April 2018
- "Lyondell on the Imputation of Fraudulent Intent," *American Bankruptcy Institute Journal*, December 2016
- "Bullard: Order Denying Confirmation Is Not Automatically Appealable," *American Bankruptcy Institute Journal*, August 2015
- "Actual-Creditor Requirement Survives § 106(a)'s Abrogation of Sovereign Immunity," *American Bankruptcy Institute Journal*, June 2014
- "Statute of Limitations for Avoidance Actions are not Topped by the Appointment of an Interim Trustee in the Seventh Circuit," *ABI Bankruptcy Litigation Committee Newsletter*, October 2013
- "Severance Payments Made to Executives Pursuant to a Plan Might Avoid 503(c)'s Limitations," *American Bankruptcy Institute Journal*, August 2013
- "Circuits Disagree Regarding Whether Funds in an IRA Inherited by a Nonspouse Debtor Are Property of the Estate," *ABI Consumer Bankruptcy Committee Newsletter*, July 2013
- "Oldco: Does a Failure to Respond Equal Implied Consent?," *American Bankruptcy Institute Journal*, June 2013
- "Two BAP Decisions Consider LIHTCs When Valuing Affordable Housing," *American Bankruptcy Institute Journal*, February 2013

## Activities and Affiliations

### Memberships

- Member, Bankruptcy Court Liaison Committee, U.S. Bankruptcy Court, Northern District of Illinois (2017 - present)
- Vice-Chair, Business Law Section Business Bankruptcy Committee, Mass Torts and Environmental Claims Subcommittee (2019 - present)
- Member, Turnaround Management Association, NextGen Committee

### Prior and Present Employment

Prior to joining Dentons, Geoff served as a judicial clerk in the United States Bankruptcy Court for the District of Arizona where he worked for the Hon. Charles G. Case II until his retirement, and then for the Hon. Daniel P. Collins (Chief Judge). Geoff also served as an extern for Judge Sean H. Lane in the United States Bankruptcy Court for the Southern District of New York, Judge Arthur B. Federman in the United States Bankruptcy Court for the Western District of Missouri and Magistrate Judge Robert E. Larsen in the United States District Court for the Western District of Missouri.

## Areas of focus

### Practices

- Commercial Litigation
- Restructuring, Insolvency and Bankruptcy

## Education

- St. John's University School of Law, 2012, LL.M., Bankruptcy
- University of Missouri-Kansas City School of Law, 2011, JD, *magna cum laude*; Note & Comment Editor, *UMKC Law Review*
- University of Kansas, 2007, BS, Finance

## Admissions and qualifications

- District of Columbia
- Illinois
- New York
- US District Court for the Northern District of Illinois

# Richard L. Fenton

## Partner



Partner

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## Overview

Richard (Rick) Fenton has practiced for 40 years in the field of complex commercial, insurance, real estate and business litigation. Rick is the chair of Dentons' national appellate practice.

Rick is a member of the Bar of Illinois, the United States Supreme Court, the United States Courts of Appeals for the Second, Fifth, Sixth, Seventh, Ninth, Tenth and Eleventh Circuits, the United States District Courts for the Northern and Central Districts of Illinois, the Southern District of Indiana and the Eastern District of Wisconsin, and the United States Tax Court. Rick also has been admitted pro hac vice in numerous state and federal jurisdictions.

Rick has been recognized repeatedly in *Best Lawyers in America* since 2008 and in Illinois *Super Lawyers* since 2005. Rick is a member of the American Bar Association and is a contributing author to the both the first (2010) and second (2017) editions of the ABA publication "A Practitioner's Guide to Class Actions."

Rick has broad experience litigating and trying a wide variety of commercial disputes in both trial and appellate courts, including securities, product liability, ERISA, antitrust, RICO and consumer class action defense, executive compensation and employment litigation, fiduciary liability, misappropriation of trade secrets and proprietary information, insurance coverage, insurance bad faith and general business litigation. Rick also has extensive experience in the area of real estate litigation, and has tried a broad range of cases in both bench and jury trial settings arising out of the sale, purchase and financing of real estate projects on behalf of owners, developers, purchasers, lenders and investors.

Rick also has represented clients in regulatory and internal investigations in the securities, employee benefit and corporate governance areas, and has extensive experience representing clients in mediation and arbitration proceedings.

## Experience

- Rick is currently lead counsel for a major national client in consolidated ERISA class actions asserting claims for reinstatement of certain retiree life insurance benefits and alleged breaches of ERISA fiduciary duties. Rick also successfully represented a major pension fund in connection with the fund's assessment of withdrawal liability against a participant in a multi-employer plan, obtaining the reversal of an arbitration award

- Rick is lead counsel for a major national insurance carrier in connection with a series of nationwide consolidated antitrust and RICO actions brought by collision repair facilities, alleging improper and collusive claims practices in connection with automobile repair. Rick also represents various insurance clients in defending national and state class actions dealing with homeowners and automobile insurance underwriting, coverage and claims practices. Rick was a lead member of the trial team that obtained a defense verdict for a major national insurance carrier in a multi-state class action that was tried in St. Clair County, and was lead appellate counsel on that same matter, where the defense verdict was affirmed.
- Rick recently was lead counsel for one of the principal insurance company defendants in a class action under the California Cartwright Act, alleging an anticompetitive conspiracy relating to the specification and use of aftermarket parts in automobile repair. After an evidentiary hearing, the federal district court denied class certification, and subsequently entered summary judgment for the defendants. Rick also represented the client on the appeal, where the judgment was affirmed by the Ninth Circuit Court of Appeals. Previously, Rick had argued the 11th Circuit appeal in another antitrust action relating to aftermarket parts, resulting in the complete dismissal of one of the largest antitrust class actions ever certified.
- Rick was lead counsel for a major national insurance carrier in connection with property claims arising out of Hurricanes Katrina and Rita, coordinating the defense of thousands of homeowners claims in both State and Federal Court, and actively first-chairing the defense of numerous class actions, mass actions, attorney general suits and other related complex litigation arising out of Hurricane Katrina. In that connection, Rick successfully argued more than a dozen major Katrina-related appeals to the United States Court of Appeals for the Fifth Circuit dealing with homeowner flood exclusions and various issues of federal jurisdiction under the Class Action Fairness Act, respectively, including several matters where Rick was selected by the Katrina insurance joint defense group to argue appeals of general importance to the insurance industry. Rick has also acted as national counsel in connection with litigation arising out of Hurricane Sandy.
- Rick recently was co-lead counsel defending foreign building materials manufacturers in major multi-district product liability litigation arising out of the manufacture, sale and distribution allegedly defective drywall products in residential and commercial construction and remodeling projects throughout the Southeast United States.
- Between 2009 and 2014, Rick was lead counsel for one of the world's largest retail mall owners/operators in defense of a major breach of contract and fiduciary liability action brought by minority investors, arising out of the acquisition and management of a national portfolio of retail mall properties.
- Rick was lead trial counsel for a major national retailer and its real estate developer in defending fiduciary and contract litigation arising out of the development and construction of an arena facility in Hoffman Estates, Illinois. Most of plaintiffs' claims were dismissed before trial, and the trial resulted in an award representing a small fraction of plaintiffs' claimed damages.

## Representative past and current clients:

- Allstate Insurance Company
- Beijing New Building Material (Group) Co., Ltd.
- Simon Property Group
- Prudential Insurance Company
- General Electric Credit Corporation
- McDonald's Corporation
- VMS Realty Partners
- Jones Lang LaSalle



- Ryan Companies
- Chas. Levy Circulating Company/Levy Home Entertainment
- Chicago Bridge and Iron Company
- Great West Insurance Company
- Sears Roebuck and Co.
- DBTel Corporation
- American Home Mortgage Corp.
- The Central Bank of Uruguay
- Hudson Highland Group
- Universal Underwriters Insurance Company
- Central States Pension Fund
- Sun Chemical Corporation

## Recognition

### Honors and Awards

- Listed in *Best Lawyers in America*, 2008–2019
- Listed in Illinois *Super Lawyers*, 2005-2017

## Insights

- Co-author, "Chapter 19: Property and Casualty Insurance," *A Practitioner's Guide to Class Actions*, October 2017

## Activities and Affiliations

### Memberships

- Federation of Defense and Corporate Counsel

## Areas of focus

### Practices

- Appellate Advocacy
- Class Action Defense
- Commercial Litigation
- Employment and Labor
- ERISA Litigation

- Internal Investigations
- Litigation and Dispute Resolution
- Pensions and Benefits Disputes
- Real Estate Litigation and Dispute Resolution

## Industry sectors

- Bad Faith Defense
- Catastrophe and Major Claims Litigation
- Financial Institutions
- Insurance
- Insurance Litigation and Arbitration
- Property, Casualty and Liability Insurance
- Real Estate
- Retail

## Education

- University of Chicago, 1978, JD
- University of Chicago, 1975, BA, with honors, Political Science, Recipient, Goettler Political Institutions Award

## Admissions and qualifications

- Illinois
- US Court of Appeals for the Eleventh Circuit
- US Court of Appeals for the Fifth Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Second Circuit
- US Court of Appeals for the Seventh Circuit
- US Court of Appeals for the Sixth Circuit
- US Court of Appeals for the Tenth Circuit
- US District Court for the Central District of Illinois
- US District Court for the Eastern District of Wisconsin
- US District Court for the Northern District of Illinois
- US District Court for the Northern District of Illinois, Trial Bar

- US District Court for the Southern District of Indiana
- US District Court for the Western District of Wisconsin
- US Supreme Court
- US Tax Court

# Brian E. Greer

## Partner

Partner

New York

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## Overview

Brian E. Greer is a partner in Dentons' Restructuring, Insolvency and Bankruptcy group, with extensive experience in complex in- and out-of-court cross-border and domestic restructuring matters. Brian has been recognized by *IFLR 1000* as a restructuring and insolvency Rising Star and by the *Legal 500 US* as a leading restructuring attorney. In addition, he received Global Finance Deal of the Year from The American Lawyer for his representation of Standard Chartered Bank in Arcapita Bank's Chapter 11 and Cayman restructuring, *M&A Advisors'* Deal of the Year (US\$100 million to \$500 million) for the restructuring of Egalet Corporation and *M&A Advisors'* Industrials Deal of the Year (over US\$100 million) for the restructuring of Modular Space Corporation.

Brian has represented hedge funds, private equity funds, asset managers, direct lenders, insurers, securitization servicers, debt issuers, directors, officers and equity sponsors through complex turnarounds, workouts, restructurings, wind-downs, bankruptcies, liquidations, assignments for the benefit of creditors, foreclosures and other stressed or distressed situations. He also regularly helps clients capitalize on opportunities as purchasers, sellers and lenders in distressed M&A transactions.

Brian's award-winning practice spans a multitude of industries, including hospitality, restaurants, commercial real estate, oil and gas, energy, REITs, manufacturing, pharmaceuticals, IT consulting, life sciences, healthcare, movie theaters, telecom, satellite, chemicals, automotive, financial services and retail.

## Experience

Prior to joining Dentons, Brian:

- Represented Standard Chartered Bank as a secured creditor in the first-ever successful Chapter 11 restructuring of a Middle Eastern financial institution, Arcapita Bank B.S.C.(c.), a Bahraini Shari'ah-compliance investment bank. The case involved the restructuring of more than US\$1.3 billion in Shari'ah compliant debt.
- Represented a public healthcare company with over 500 facilities and revenue exceeding US\$1 billion in connection with its out-of-court restructuring.
- Represented Wells Fargo, as special servicer, to a special-purpose subsidiary of Toys "R" Us, Inc., with

- Represented the second lien ad hoc noteholder group in the restructuring of Modular Space Corporation. Represented first lien creditors in the cross-border restructuring of Global A&T Electronics LTD.
- Represented the second lien ad hoc noteholder group in the restructuring of Logan's Roadhouse restaurant group.
- Represented the indenture trustee and first lien ad hoc noteholder group with respect to claims of approximately US\$1.1 billion issued by Momeni Performance Materials, Inc., under the Momeni first lien indenture.
- Represented Egalet Corporation in connection with its prepackaged chapter 11 case, achieving a debt for equity exchange and a novel substantial acquisition, effective upon confirmation.
- Represented GIC Re, a Government of Singapore investment vehicle, in the restructuring of approximately US\$300 million of mezzanine loans relating to the MSR portfolio, resulting in GIC Re's purchase of five hotels for approximately US\$1B (including credit bid).
- Represented Lehman Brothers in more than US\$300 million in first-lien mortgage claims against the Innkeepers portfolio, achieving payment in full through the sale of collateral.
- Represented Emtec, Inc., in its out-of-court restructuring of more than US\$75 million in first-lien term debt.
- Served as global counsel to Arclin US Holdings, Inc., Arclin Canada Ltd., and their affiliates, manufacturers of adhesive resins and overlay products utilized in construction, furniture, industrial and automotive applications, in the restructuring of US\$235 million in total funded secured debt and the chapter 11 cases of Arclin US Holdings, Inc., and its domestic subsidiaries.
- Represented the outside directors of Lehman Brothers Holdings, Inc., in Lehman's chapter 11 cases.

## Recognition

- Leading Restructuring Attorney, *The Legal 500 US*
- Highly Regarded (Restructuring and Insolvency), *IFLR1000*
- Rising Star (Restructuring and Insolvency), *IFLR1000*

## Activities and Affiliations

### Memberships

- Committee Member, Bankruptcy Remote Entities, Bankruptcy-Proofing and Public Policy Advisory Committee for the American Bankruptcy Institute Commission to Study Chapter 11 Reform
- American Bankruptcy Institute
- INSOL
- Turnaround Management Association
- Next Generation Committee for the UJA
- Mentor NJ Leep

# Areas of focus

## Practices

- Restructuring, Insolvency and Bankruptcy
- Creditor and Equity Committee Representation
- Cross-Border Restructuring Matters
- Debtor Representation
- Distressed M&A, Investing and Debt Trading
- Financial Institution Insolvency
- Mergers and Acquisitions

## Industry sectors

- Global Private Services (GPS)

# Education

- Hofstra University School of Law, 1998, JD, Research Editor of the *Hofstra Law Review*
- Stony Brook University, 1995, BA, Psi Chi National Honor Society

# Admissions and qualifications

- New York
- US Court of Appeals for the Second Circuit
- US District Court for the Eastern District of Michigan
- US District Court for the Eastern District of New York
- US District Court for the Southern District of New York

# Lynn P. Harrison, III

## Partner

Partner

New York

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lynn.harrison@dentons.com

## Overview

Lynn P. Harrison III is a Partner in the Restructuring, Insolvency and Bankruptcy practice. He is regarded as a leading lawyer on international and cross-border insolvencies, with more than 30 years of experience in workouts, reorganizations and liquidations on behalf of debtors, creditors, liquidators and trustees. Clients call him a “hardworking star individual,” according to *The Legal 500* 2019.

Lynn’s clients have included foreign and domestic corporations, both public and private; financial institutions; underwriters and governmental creditors. He advises them on Chapter 11 reorganizations, Chapter 15, and other ancillary proceedings, structured financings, distressed trades and acquisitions.

In addition to his practice, Lynn is a frequent lecturer and prolific writer on international and domestic insolvency issues. In 2019, he was invited to participate in the Second Circuit Judicial Conference, where he served on a panel among US bankruptcy judges addressing “Failures Without Borders: Adjudicating Global Insolvencies.”

## Experience

Prior to joining Dentons at his former firm, Lynn led the insolvency aspects of the representation of Lehman Brothers Holdings Inc. and its affiliates, in one of the largest and most complex Chapter 11 case ever filed. He also represented the Italian Extraordinary Administrator a multinational dairy and food conglomerate, in restructuring several of the company’s subsidiaries in the United States and Latin America.

Amongst his extensive international experience includes such cases as China Fishery, Abengoa, Arcapita, SLS Capital and Gruppo Covarra S.A. de C.V.

## Recognition

### Honors and Awards

- 2020 *Lawdragon* 500 Leading Global Restructuring & Insolvency Lawyers
- Ranked by *The Best Lawyers in America* for Bankruptcy and Creditor Debtor Rights/Insolvency and

# Activities and Affiliations

## Memberships

- International Insolvency Institute (III)
- INSOL Fellow
- World Bank's Insolvency and Creditor/Debtor Regimes Task Force

# Areas of focus

## Practices

- Restructuring, Insolvency and Bankruptcy
- Cross-Border Restructuring Matters
- Financial Institution Insolvency

# Education

- New York University, School of Law, 1983, JD
- Morehouse College, 1979, BA

# Admissions and qualifications

- New York



# Michael R. Maryn

## Partner



Partner

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## Overview

Michael Maryn is a partner in Dentons' Pension, Benefits and Executive Compensation practice, with extensive experience in all aspects of employee benefits and executive compensation.

Michael routinely counsels clients in the design and administration of qualified retirement plans, including 401(k), profit sharing, employee stock ownership plans (ESOPs) and defined benefit plans. Michael frequently negotiates administrative services agreements as well as investment advisory and investment management agreements. He also counsels plan fiduciaries with respect to their fiduciary responsibilities.

In the executive compensation area, Michael represents and counsels both employers and executives in negotiating employment agreements, change of control (parachute) agreements, severance agreements and retention agreements.

Michael also counsels employers in the design and implementation of nonqualified deferred compensation arrangements, including compliance with Section 409A of the US Internal Revenue Code, and of equity incentive plans, including stock options, restricted stock, stock appreciation rights, phantom stock, deferred stock and other performance awards. He has extensive experience handling equity and cash incentive arrangements for partnerships and limited liability companies, including arrangements utilizing profits interests and tiered partnership structures.

Michael represents tax-exempt organizations with respect to their unique executive compensation issues, including designing and implementing 403(b) annuity plans and 457 plans, as well as advising tax-exempt organizations and their boards concerning all aspects of executive compensation.

With a substantial track record addressing the Employee Retirement Income Security Act (ERISA), Michael has handled a range of issues arising in connection with investment fund formation and operation, including transactional experience involving real estate operating companies and venture capital operating companies, private equity funds and mortgage- and other asset-backed securities pools. He counsels insurance companies and financial institutions concerning prohibited transaction and fiduciary responsibilities in connection with product design, sales practices, compensation structure and service arrangements. Furthermore, he represents clients in connection with fiduciary responsibility and prohibited transaction issues involving mergers and acquisitions, corporate control and leveraged ESOP transactions.

Michael is a frequent speaker and has authored numerous articles on ESOPs, nonqualified deferred compensation plans, equity-incentive compensation and employee benefits case law developments.

# Activities and Affiliations

## Presentations

- "Ins and Outs of Granting Equity to Employees of LLCs and Partnerships," 31st Annual National CLE Conference: Employee Benefits, Vail, CO, January 2014
- Panelist, "409A Compliance and Correction: Continued Guidance and Lingering Issues in Administering Plans and Avoiding Operational and Documentary Failures," American Conference Institute (ACI) Employee Benefit Plans Conference, New York, NY, May 2013
- "Moving Ahead for Progress in the 21st Century (MAP-21)," ALI-CLE Course of Study: Pension, Profit Sharing, Welfare, and Other Compensation Plans, San Francisco, CA, March 2013
- "So, You Have an Error in Your Non-Qualified Deferred Compensation Plan: What to Do," 30th Annual National CLE Conference: Employee Benefits, Snowmass, CO, January 2013
- "Correcting Section 409A Errors," 29th Annual National CLE Conference: Employee Benefits, Snowmass, CO, January 2012
- "Non-Qualified Deferred Compensation from Tax Indifferent Parties (Code § 457A)," 28th Annual National CLE Conference: Employee Benefits, Vail, CO, January 2011
- Panelist "Cash Balance Plans: Keeping Pace with the Changing Requirements," American Conference Institute (ACI) Employee Benefit Plans Conference, New York, NY, May 2010
- "Severance and Retention Plans: Practical Considerations," University of Missouri-Kansas City 24th Annual Employee Benefits Institute, Kansas City, MO, April 2010
- "New Developments in Employee Benefits Litigation," 39th Annual Retirement and Benefits Management Seminar sponsored by the University of South Carolina's Moore School of Business, Charlotte, NC, April 2010

## Memberships

- American College of Employee Benefits Counsel
- American Bar Association, Tax Section
- Employee Benefits Committees

# Areas of focus

## Practices

- Employment and Labor
- Employment Disputes
- ERISA Litigation
- Executive Employment and Severance Agreements

- Government and Public Sector Plans
- Health and Welfare Benefits
- Investment Funds and Income Trusts
- Multiemployer Plans (MEPPs/Industry-Wide Plans)
- Partnerships and Other Pass-Through Entity Taxation
- Pensions, Benefits and Executive Compensation
- Pensions and Benefits Disputes
- Pensions and Benefits in Transactions and Reorganizations
- Pensions and Retirement Plans
- Plan Fiduciary Advice, Funding and Investments
- Plan Governance
- Real Estate
- Share Schemes and Equity/Stock-Based Incentive Plans
- Venture Technology and Emerging Growth Companies
- Employee Benefits and Retirement Funds

## Industry sectors

- Insurance
- Life Sciences and Health Care
- Private Equity

## Education

- Columbus School of Law, The Catholic University of America, 1989, JD
- University of Maryland, 1983, BS, Economics; *magna cum laude*; with high honors

## Admissions and qualifications

- District of Columbia

# Justin N. Kattan

## Partner



Partner

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## Overview

Justin Kattan is a partner in Dentons' Litigation & Dispute Resolution practice. Justin is experienced in many areas of litigation, including real estate, complex financial products, securities, insurance coverage, intellectual property, tax and complex contractual disputes.

## Experience

Over the past several years, Justin has represented banks and other institutional lenders, insurance companies and actuarial firms, in a variety of suits arising out of defaulted and distressed assets and complex financial products, including:

### Financial Institution Experience

- Successfully representing a financial services company and its former officers in a securities fraud class action alleging false and misleading statements regarding an IPO of a mortgage insurance business, including allegedly false and misleading statements about the business's financial health, claims handling practices, and loss reserves.
- Lead trial counsel on behalf of a defendant German bank at the May 2016 jury trial of a \$200 million lender liability action.
- A multi-hundred million dollar tax trial in Texas Federal Court in late 2008/early 2009 involving a disputed deduction of losses arising out of the acquisition of a Chinese non-performing loan portfolio.

### Insurance Experience

- Significant roles in two jury trials involving the World Trade Center property insurance coverage dispute, one of the largest property insurance cases in history (involving claims in excess of \$7 billion).
- Representing an insurance carrier in a suit to adjudicate the obligations of a financial institution managing a reference pool of assets underlying a series of credit swap transactions.

### Real Estate Experience

- Successfully defending a German bank against a \$200 million lender liability suit brought by the developers of a failed construction project in Pennsylvania.
- Achieving a \$76 million summary judgment award in March 2010 on behalf of a group of European lenders in a suit in New York federal court against the guarantors of a failed construction project in Florida. HSH Nordbank AG New York Branch v. Swerdlow, 672 F. Supp. 2d 409 (S.D.N.Y. 2009). Justin also argued the case on appeal before the Second Circuit in April 2011, and the judgment was affirmed.
- Achieving a favorable settlement on behalf of a UK bank in a \$10 million "lender liability" suit brought by a developer in New York state court.

### Healthcare Experience

- Acting as national coordinating counsel on behalf of an actuarial firm against ongoing negligence, fraud and breach of contract actions brought by several state Insurance Commissioners arising out of the firm's work for state health insurance co-operatives established under the Affordable Care Act.
- A 2003 ERISA wrongful termination action tried in the Southern District of New York.

### Intellectual Property Experience

- A 2006 federal jury trial in which he successfully defended a copyright infringement claim on behalf of prominent recording artists Kanye West and Christopher "Ludacris" Bridges.

## Recognition

### Honors and Awards

- Selected to *Law360's* "Rising Star" Insurance list, 2014

## Activities and Affiliations

### Community Involvement and Pro Bono

Justin is the head of Dentons' pro bono moot court and mock trial mentoring program for disadvantaged high school students.

## Areas of focus

### Practices

- Financial Services Litigation
- Intellectual Property and Technology
- Litigation and Dispute Resolution
- Real Estate
- Real Estate Litigation and Dispute Resolution
- Tax Litigation and Dispute Resolution

### Industry sectors

- Financial Institutions
- Insurance
- Insurance Litigation and Arbitration
- Investment Banks and Broker Dealers

## Education

- Northwestern University School of Law, 2000, JD
- Brandeis University, 1997, BA

## Admissions and qualifications

- New York
- US Court of Appeals for the Fifth Circuit
- US Court of Appeals for the Second Circuit
- US Court of Appeals for the Third Circuit
- US District Court for the Northern District of New York
- US District Court for the Southern District of New York

# Kristin L. Holland

## Partner



Partner

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## Overview

Kristin L. Holland is a partner in Dentons' Honolulu office. Kristin litigates commercial, real estate, civil rights, class action and intellectual property matters. She develops efficient and intelligent strategies to win cases and resolve disputes for private and public corporations, media companies, lenders, real estate investment trusts (REITs) and rights holders ranging from social media websites to film studios to clothing retailers.

Holland has litigated copyright, trademark, trade secret, advertising, defamation and false light claims for media companies throughout the US. She regularly handles idea-theft disputes for major media companies as well as trademark litigation related to the titles of television series, and has defeated demands for temporary restraining orders. She has also litigated numerous copyright infringement cases related to fabric patterns, many through summary judgment and appeal and one through a jury trial on liability issues.

Holland has handled class actions involving sweeps of the homeless by the City and County of Honolulu, deprivation of special education services by the state Department of Education, and coverage for applied behavioral analysis treatment under Medicaid for children with autism. In California, she litigated class actions involving closed-captioning on DVDs, the Telephone Consumer Protection Act, representations to consumers by an online travel company, California's Unfair Competition statutes, student admissions at for-profit universities, and tenant complaints related to condominium conversion projects. She has also litigated securities fraud matters related to alleged misrepresentations in investment materials.

In the real estate field, Holland has litigated a wide range of cases from inception through appeal, securing full victories at bench and jury trials and through binding arbitration, including awards of costs and attorneys fees, in matters involving bankruptcy issues, disputes between brokers, franchisor/franchisee issues, construction defect, mass excavation and grading disputes, landslide issues, disputes regarding purchaser deposits, bond issues, alleged mishandling of escrow funds, dissolution of real estate partnerships, foreclosure and deed-in-lieu disputes, guarantor claims and lender liability issues. She obtained a US\$40 million judgment against a guarantor developer that defaulted on a loan related to a 400+ unit condominium conversion project in Northern California.

Kristin graduated from UCLA School of Law, where she was on the Moot Court Board and an editor of the *Journal of Environmental Law and Policy*, and received her undergraduate degree in political science from UC, Berkeley. She has been on the boards of the Association of Media and Entertainment Counsel, the Center for Law in the Public Interest, the Women Lawyers Association of Los Angeles, the West Coast Executive Board of the Women's

Holland has also served as vice chair of the ABA Business Law Litigation's Intellectual Property Subsection, is a Fellow of the Litigation Counsel of America and has been a member of the Litigation Committee of the Media Law Resource Center. She has been recognized by Super Lawyers in California and Hawai'i. She is also a frequent speaker and contributor on litigation practice and intellectual property issues.

## Recognition

- Litigation Counsel of America (LCA), Senior Fellow (2010-present)
- Super Lawyers (2012-2014), Southern California Rising Star (2006-2008, 2010-2011)
- Association of Media and Entertainment Counsel, Founder's Award (2010)
- Lawdragon, Finalist (2005)

## Activities and Affiliations

- Hawaii State Bar Association
- The State Bar of California
- Past Vice Chair, Business Law Litigation, Intellectual Property Subsection, American Bar Association (ABA)
- UC Berkeley Alumni Association
- Women's Leadership and Mentoring Alliance
- West Coast Executive Board (2010-2014)
- Former co-chair, Litigation Section, Association of Media and Entertainment Counsel
- Writer in Residence, Ms. JD (2014)

## Areas of focus

### Practices

- Litigation and Dispute Resolution
- Alternative Dispute Resolution (ADR)
- Appellate Advocacy
- Competition and Antitrust
- Class Action Defense
- Commercial Litigation
- Intellectual Property and Technology
- Intellectual Property Litigation
- Trademark and Copyright Litigation



- Insurance
- Professional Liability

## Education

- University of California at Berkeley, BA, Political Science, with Distinction and Honors
- University of California at Los Angeles, JD

## Admissions and qualifications

- California
- Hawai`i
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the District of Hawai`i
- US District Court for the Northern District of California
- US District Court for the Southern District of California

## Languages

- English

# Susan M. Walker

## Partner



Partner

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## Overview

Susan is a partner in the Litigation and Dispute Resolution practice, with a dual focus on insurance-related disputes—including coverage actions, bad faith cases and contribution claims—and complex commercial litigation, including class actions, shareholder derivative suits and other multi-party litigation.

In the area of insurance litigation, Susan primarily has represented insurance companies and health plans as both plaintiffs and defendants in cases involving health insurance reimbursement, and suits involving first- and third-party coverage claims arising out of commercial and personal line policies; and as subjects or targets of regulatory investigations or enforcement proceedings. Representative clients include Allstate Insurance Co., Travelers Insurance Co., Berkshire Hathaway affiliate UnitedHealth, PacifiCare Life and Health Insurance Co., and the Local Initiative Health Authority for Los Angeles County (dba L.A. Care Health Plan).

Susan's commercial litigation experience includes representing companies, across a range of industries, at pretrial and settlement conferences and full-fledged trials in federal and state courts in California and Nevada; and on appeals before the US Court of Appeals for the Ninth Circuit, the Supreme Court of California and various California courts of appeal.

## Experience

Ms. Walker represents primarily insurance companies and health plans. Representative clients include Allstate Insurance Company, Travelers Insurance Company, Berkshire Hathaway affiliates, UnitedHealthcare, PacifiCare Life and Health Insurance Company and the Local Initiative Health Authority for Los Angeles County dba L.A. Care Health Plan.

- **Crest Energy International LLC:** Advising in connection with the debt financing and acquisition of WesternZagros Resources Ltd. (having oil and gas assets in the Kurdistan Region of Iraq) by way of statutory plan of arrangement

## Activities and Affiliations

- Member, California State Bar Association
- Member, Association of Business Trial Lawyers

## Areas of focus

### Practices

- Appellate Advocacy
- Class Action Defense
- Commercial Litigation
- Litigation and Dispute Resolution

### Industry sectors

- Accident and Health Insurance
- Bad Faith Defense
- Catastrophe and Major Claims Litigation
- Coverage Counseling and Defense
- Insurance
- Insurance Litigation and Arbitration
- Property, Casualty and Liability Insurance
- Sales Practices Litigation

## Education

- University of California, Davis School of Law, 1987, JD, Order of the Coif, Executive editor, *UC Davis Law Review*
- University of California at Los Angeles, BA
- University of Southern California, MA

## Admissions and qualifications

- California
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Southern District of California

# Sandra R. McCandless

## Partner



Partner

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## Overview

Sandra McCandless is the head of Dentons' Employment and Labor practice in California. She represents management in all aspects of labor and employment, including class action and individual litigation, arbitration, mediation and the provision of employment-related advice.

Sandra has a highly successful track record of representing employers in a wide variety of industries in both the unionized and nonunion sectors—technology, banking, insurance, hotels, manufacturing, automotive, food, trucking, retail, garments, maritime and trade, among others—in matters throughout the labor and employment continuum, from employment contract drafting and collective bargaining negotiations to wrongful termination and discrimination litigation. She has a long track record of winning employment cases on summary judgment and successful representation of employers before government agencies.

She is one of a handful of employment lawyers in the United States who are experienced in the representation of Indian tribes, tribal casinos and other tribal businesses.

Sandra has also practiced in the international arena throughout her career, representing many Asian and European companies doing business in the US. She has assisted multinational companies on the broad spectrum of labor and employment issues across the globe, working on matters involving Asian, European, Middle Eastern and African operations, as well as those in North America.

Sandra recently completed a three-year term on the board of governors of the American Bar Association and as chair of its Finance Committee. She is also the chair of the Employment and Immigration Committee and a council member of the Inter-Pacific Bar Association, an international association of business lawyers with a focus on the Pacific Rim; a board member of the California-Asia Business Council and of the National Native American Bar Association Foundation; and a trustee of the Tony Award-winning Berkeley Repertory Theatre.

Earlier in her career Sandra, was a lawyer for the Appellate Court Litigation Branch of the National Labor Relations Board in Washington, DC.

## Recognition

- Selected as one of the "Top Labor & Employment Lawyers," *Daily Journal*, 2019
- Listed, *Best Lawyers*, Employment Law - Individuals, 2018-2020
- Listed, *Best Lawyers*, Employment Law - Management, 2018-2020
- *Chambers USA: America's Leading Lawyers for Business*, Labor & Employment in California, 2015, 2018-2020; Noted practitioner, Labor & Employment in California, 2014. Clients recognize Sandy as "responsive, her turnaround time is excellent and she always works towards our business needs."
- *Legal 500*: Labor and employment - Workplace and employment counseling, 2019
- Selected as one of the "Most Influential Women in Bay Area Business," *San Francisco Business Times*, 2014
- College of Labor and Employment (selected by nomination and election)
- Northern *California Super Lawyer*, 2005–2014
- Recipient, American Bar Association Liberty Achievement Award for enhancing diversity in the legal profession, 2010
- Recipient, National Labor Relations Board Certificate of Commendation for High Quality Performance

## Insights

- Co-author, "10 new California laws your business must understand for 2020," Dentons client alert, October 22, 2019
- Co-author, "California dreaming, California nightmare - 3 takeaways from California's controversial independent contractor bill becoming law," Dentons client alert, September 23, 2019
- Co-author, "Tectonic shift - Key takeaways as California Legislature passes controversial independent contractor bill," Dentons client alert, September 12, 2019
- Author, "California's Employment Regulatory Scheme: PAGA in Wake of Epic Systems," *International Law Office*, June 26, 2019
- Co-editor, "Sexual Harassment and Retaliation: A Practical Handbook for Plaintiff and Defense," American Bar Association, Spring 2019
- Author, "Mediations and Releases," *Practitioner's Guide to Defense of Employment Practices Liability Claims*, Fourth Edition, 2018
- Co-Author, "California toughens equal pay law," Dentons client alert, October 21, 2015
- "Mediation and Releases," *The Practitioner's Guide to Defense of Employment Practices Liability Claims*, Third Edition, 2013
- "Discovery and Deposing the Plaintiff and Plaintiff's Witnesses: Defense Perspective," *Litigating the Workplace Harassment Case*, First Edition, 2010
- "Management and Control of United States Subsidiary Employees and Operations: What Roles and Responsibilities Do a Japanese Company and Its Subsidiaries Have in Relations to Employees Under United States Employment Laws?," *The Challenges of American Litigation -- A Primer for Japanese Legal Staff Managing Litigation in the United States*, 2007
- "An Employment Litigator's Summary Guide to Summary Judgment," *Employment Discrimination and Civil*

- "Representing the Employer and Individual Co-Defendant in Employment Cases: Legal Strategies and Ethical Considerations," *Trying the Employment Tort Case*, Second Edition, 2001
- "Trial as Theatre: Directing the Courtroom Drama," *Theatre, Technology and Persuading Juries in the Twenty-First Century*, 2001
- "Kiss Your Sexual Harassment Claims Goodbye," *Tort Source*, American Bar Association Tort Trial and Insurance Practice Section, 1998
- Editor, *Guide to Equal Employment Practices*, Warren Gorham & Lamont, 1997
- "Employing Workers Abroad: A Guide to Legal Requirements of Employment in Selected Nations," *THE BRIEF*, Vol. 23, No. 1, 1993
- "Examining a Psychotherapist at Trial," *THE BRIEF*, Vol. 18, No. 3, 1989

## Activities and Affiliations

### Presentations

- Speaker, "A Multi Jurisdiction Approach to Termination of Employees," Annual Meeting of the Inter-Pacific Bar Association, April 2019
- Speaker, "Practical Insights for US Employers Considering Adopting a Mandatory Arbitration Program in Light of the SCOTUS' Recent Decision in *Epic Systems*," July 25, 2018
- Panelist, of the Inter-Pacific Bar Association in Manila, Philippines, March 2018
- Moderator and Speaker, "Employment in Today's Global Order: Transcending Politics with Best Employment Practices," International Law Section of the American Bar Association, October 2017
- Speaker, "Changes in Federal Law and The Impact on Native America," Native Nations Human Resources Conference, Las Vegas, NV, January 26, 2015
- Panelist, "Global Mobility Forum," American Immigration Lawyers Association, Boston, MA, June 2014
- Moderator, "Cutting Edge Corporate Employment and Immigration Issues," Vancouver, BC, Canada, May 2014
- Speaker, "Privacy and Social Media in the Workplace," San Francisco, CA, January 2014
- Panelist, "Labor and Employment Law Update: The Latest Developments in Indian Country," Fourth Annual Native Nations Human Resources Conference, Temecula, CA, January 2014
- Panelist, "Social Media and the Workplace," Seoul, Korea, 2013
- Speaker, "Labor and Employment in Indian Country: Make Sure your Sovereignty is Not in Question," Third Annual Native Nations Human Resources Conference, Pala, CA, January 2013
- Panelist, "The Asia-Pacific Market Update: A Look Ahead to the Challenges and Opportunities in 2013 and Beyond," Hildebrandt Institute/West LegalEdcenter's 20th Annual Marketing Partner Forum, Los Angeles, CA, January 2013
- Speaker, "Labor and Employment Law Update," Second Annual Native American Human Resources Conference, San Diego, CA, June 2012
- Panelist, "The Rising Significance of Cross-Border Employment: Issues, Difficulties and Solutions," Inter-Pacific Bar Association, New Delhi, India, March 2012

- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc Main Document Page 123 of 1318
- Speaker, "Resurgence of Disparate Impact Class Litigation, Statistical, and Other Expert Testimony, and the Role of the OFCCP," ALI-ABA Current Developments in Employment Law: The Obama Years at Mid-Term, Santa Fe, NM, July 2011
  - Speaker, "The Obama NLRB: What the New Board Means for Employers and for Unrepresented Employees," ALI-ABA Current Developments in Employment Law: The Obama Years at Mid-Term, Santa Fe, NM, July 2011
  - Speaker, "Leveraging Social Media—While Avoiding the Risks," Palo Alto, CA, March 2011
  - Speaker, "Practical Tips for Chinese Employers Doing Business in the United States," American Bar Association Tort Trial and Insurance Practice Section, Beijing, China, September 2009

## Memberships

- California-Asia Business Council, member, board of directors
- National Native American Bar Association Foundation, member, board of directors
- Korean-American Chamber of Commerce of San Francisco
  - Member, board of directors
  - Former chair
- Berkeley Repertory Theatre
  - Trustee
  - Former vice president
  - Former Corporate Council chair
- Arbitrator, American Arbitration Association Labor and Employment Panel
- Early neutral evaluator, US District Court for the Northern District of California
- Inter-Pacific Bar Association
  - Chair, Employment and Immigration Committee
  - Member, Governing Council
- Member, College of Labor and Employment Lawyers
- Past governor, board of governors of the American Bar Association
- Past chair, Tort Trial and Insurance Practice Section, American Bar Association and its Committee on Employer-Employee Relations
- Past chair, Committee on Labor Law, San Francisco Barristers Club
- Serves on Dentons' Ethics Committee

## Areas of focus

### Practices

- Arbitration
- Employment and Labor

- Litigation and Dispute Resolution
- Mergers and Acquisitions
- Native American Law and Policy (United States)

## Industry sectors

- Life Sciences and Health Care
- Luxury, Fashion and Beauty
- Manufacturing
- Media, Entertainment and Sports
- Professional Services
- Retail
- Technology
- Cannabis

## Issues and opportunities

- Cannabis in the United States

## Education

- Georgetown University Law Center, JD
- Harvard University, BA, Government; with honors

## Admissions and qualifications

- California
- US Court of Appeals for the First Circuit
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Seventh Circuit
- US Court of Appeals for the Sixth Circuit
- US District Court for the Central District of California
- US District Court for the District of Colorado
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US Supreme Court



# Timothy J. Santoli

## Partner



Partner

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## Overview

Timothy Santoli is a member of Dentons' Taxation practice. He has expertise in a wide variety of domestic and international federal income tax matters, including domestic and cross-border tax-planning strategies as well as taxable and tax-free mergers, acquisitions and dispositions of domestic and foreign corporations.

## Recognition

### Honors and Awards

- Ranked, *Legal 500 US*, Non-Contentious Tax, 2020
- Ranked, *Legal 500 US*, International Tax, 2020

## Insights

- "IRS and Treasury finalize Section 199A rental real estate safe harbor guidelines," Dentons client alert, October 9, 2019
- "Partnership Buyers, Beware IRS Withholding Proposal," *Law360*, May 20, 2019
- Co-author, "Tax Planning for Single Member Entities: Check-the-Box, Qualified REIT Subsidiaries and S-Corp Subsidiaries," *Practising Law Institute*, 2006
- Co-author, "Partnership Noncompensatory Options and Convertible Instruments: Proposed Treasury Regulations Clarify Tax Treatment," *Corporate Business Taxation Monthly*, August 2003
- "A Decade After Employment Division v. Smith: Examining How Courts Are Still Grappling with the Hybrid-Rights Exception to the Free Exercise Clause of the First Amendment," *Suffolk University Law Review*, 2001

# Activities and Affiliations

## Presentations

- Speaker, Tax seminar, "US inversion rules and accidental inversion", March 17, 2015

## Memberships

- Member, Tax Section New York State Bar Association,
- Member, USA Branch of the International Fiscal Association
- Member, Foreign Activities of U.S. Taxpayers
- Member, US Activities of Foreigners
- Member, Tax Treaties Committee, Tax Section, American Bar Association

# Areas of focus

## Practices

- Corporate
- Corporate Taxation
- Individual Taxation
- International Taxation
- Partnerships and Other Pass-Through Entity Taxation
- Tax
- Taxation in Mergers and Acquisitions
- Restructuring, Insolvency and Bankruptcy

## Industry sectors

- Cannabis
- Private Equity

## Issues and opportunities

- Cannabis in the United States

# Education

- New York University, 2002, LL.M., Taxation
- Suffolk University, 2001, JD, *magna cum laude*, *Suffolk University Law Review*
- The State University of New York at Stony Brook, 1998, BA

# Admissions and qualifications

- Massachusetts
- New York

# Lee P. Whidden

## Partner



Partner

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## Overview

Lee P. Whidden is a partner in Dentons' Restructuring, Insolvency and Bankruptcy group.

She concentrates her practice in the areas of corporate bankruptcy reorganizations, creditors' rights and bankruptcy related litigation. In 2011, Lee was part of the team that won The M&A Advisor's Cross-Border Deal of the Year Award for the Chapter 11 Reorganization of Sea Launch.

## Experience

- Representing the leading Russian rocket space enterprise in the field of manned and unmanned space systems in its purchase of a US commercial satellite launch company, as part of a Plan of Reorganization;
- Representing Swiss and US satellite launch services providers in contract disputes and out of court restructuring of their business;
- Representing the SDIF (the Turkish equivalent of the FDIC) in bank insolvency litigation relating to pursuit of assets of bank shareholders who orchestrated the largest bank fraud in Turkish history;
- Representing Telsim Telekomunikations by appointment from Turkish SDIF in Motorola v. Telsim regarding enforcement of Swiss Arbitration Award;
- Defense of breach of fiduciary duty claims against the officers and directors of the French and Swiss shareholders of a US Company operating a chain of jewelry stores;
- Defense of a French citizen in a lawsuit brought by the liquidating trustee of Renaissance Cruises, Inc. alleging fraud and fraudulent conveyance;
- Representing a German company in the purchase of manufacturing assets from a US entity in Chapter 11;
- Representing Export Bank of Canada, Canada's export credit agency, as secured creditor in the recovery of assets in the Tower Automotive reorganization case;
- Representation of a Japanese Company in defense of claims of discrimination brought by a US debtor;

- Defense of president and vice president of a retail clothing chain of stores against breach of fiduciary duty claims;
- Representing a Scandinavian bank as secured creditor in restructuring real estate holdings;
- Representing the US subsidiary of a Swedish company in settlement of patent infringement litigation dispute;
- Representing a Hong Kong based retail merchandise sourcing company and its affiliates in defense of preference actions and claims objections brought against them by US debtors.

## Areas of focus

### Practices

- Restructuring, Insolvency and Bankruptcy
- Insolvency Litigation and Enforcement
- Litigation and Dispute Resolution
- Commercial Litigation
- Corporate Governance
- Creditor and Equity Committee Representation
- Cross-Border Restructuring Matters
- Representation of Government and Quasi-Government Organizations

### Industry sectors

- Aviation and Aerospace
- Financial Institutions
- Hotels
- Luxury, Fashion and Beauty
- Retail

## Education

- University of Virginia, 1988, JD
- University of South Florida, English Literature

## Admissions and qualifications

- New York
- Qualified, US Court of Appeals for the Sixth Circuit, 1989
- Qualified, US District Court for the Northern District of Texas, 1989
- Qualified, US District Courts for the Southern and Eastern Districts of New York, 1989

# Languages

- English
- Greek

# Sonia R. Martin

## Office Managing Partner



Office Managing Partner

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## Overview

Sonia Martin is a partner in Dentons' Litigation and Dispute Resolution practice. She serves as managing partner of the Firm's San Francisco and Oakland offices and is also a member of Dentons' Global and US Boards.

Sonia has extensive experience defending consumer class actions against insurers and financial institutions, including claims for alleged violations of California's Unfair Competition Act, Business and Professions Code Section 17200, *et seq.*

She has successfully tried cases in state and federal court, argued matters before the California Court of Appeal and the Ninth Circuit Court of Appeals and obtained published decisions in many cases of first impression.

## Experience

- Tried to final decision and judgment before the Los Angeles Superior Court a class action brought under California's UCL and alleging that the state's largest underwritten title company had charged over 270,000 class members more than the permitted filed rates for escrow-related fees. The trial yielded a decision in favor of the defendant on statutory immunity grounds, affirmed in full on appeal. See *Kirk et al. v. First American Title Co.*, BC 372797 (LASC, 2014), B257508 (Cal. Ct. App., June 22, 2016)
- Trial counsel in a series of certified (*Sjobring v. First America*; *Kaufman v. First American*) and putative (*Wilmot v. First America*; *Muehling v. First American*) class actions involving alleged excessive escrow fees and title premiums. After years of significant litigation, *Sjobring* and *Kaufman* were dismissed in October 2018, on motions for judgment on the pleadings, and *Wilmot* is currently on appeal from denial of plaintiff's motion for class certification in February 2018 (*Muehling* was unilaterally dismissed by plaintiff). The plaintiffs' combined demand in these class actions exceeded \$750 million.
- Obtained summary judgment for insurer in putative class action challenging its alleged failure to pay for seatbelt inspection, repair and replacement.
- Obtained order compelling appraisal in putative class action challenging insurer's alleged failure to include shipping costs in its actual cash value payments on personal property claims.
- Trial counsel in multi-week confidential arbitration of a trade secrets dispute involving a \$99 million damages

- Obtained summary judgment for insurer in putative class action challenging its alleged failure to pay for seatbelt inspection, repair and replacement.
- Obtained order compelling appraisal in putative class action challenging insurer's alleged failure to include shipping costs in its actual cash value payments on personal property claims.
- Prepared successful motion to decertify class and oppositions to partial summary judgment motions in putative class action challenging insurer's underinsured motorist claim handling practices.
- Obtained appellate victory in the Ninth Circuit concerning dismissal of putative class action challenging an insurer's method of calculating depreciation on personal property claims.
- Obtained published opinion from California Court of Appeal on matter of first impression on behalf of coverage attorney in his appeal of an order denying anti-SLAPP motion, in *Seltzer v. Barnes*, 182 Cal. App. 4th 953 (2010). On remand, the trial court awarded her client in excess of US\$121,165 in attorneys' fees.
- Defeated class certification and obtained partial summary judgment for insurer in putative multi-state class action challenging its claim handling practices.
- Obtained dismissal of class allegations in putative class action challenging insurer's mold claim handling practices.
- Obtained summary judgment for employer in retaliation and age discrimination case.
- Obtained back-to-back trial victories in three cases pending in the US District Court for the Northern District of California. The cases involved breach of contract and bad faith claims arising from the handling of first-party property and auto claims.
- Obtained an appellate victory in the Ninth Circuit for Universal Underwriters Insurance Company in *Duarte v. Universal Underwriters*, which concerned a first-party property coverage dispute.
- Prevailed at arbitration on behalf of Bristol West Insurance Company in an alleged "whistleblower" suit.

## Recognition

### Honors and Awards

- Named one of the Top 50 Women Lawyers in California by the National Diversity Council, 2016
- Listed by *Benchmark Litigation* as a "Future Star" in California: first year listed, 2013; most recent listing, 2016

## Activities and Affiliations

### Memberships

- Treasurer, Ninth Judicial Circuit Historical Society
- Former lawyer representative, United States District Court, Northern District of California

## Areas of focus

### Practices



- Class Action Defense
- Commercial Litigation
- Fraud, Corruption and Asset Recovery
- Litigation and Dispute Resolution

## Industry sectors

- Bad Faith Defense
- Catastrophe and Major Claims Litigation
- Coverage Counseling and Defense
- Insurance
- Property, Casualty and Liability Insurance

## Education

- UC Hastings College of the Law, 1997, JD, *cum laude*, Order of the Coif
- University of California, San Diego, 1994, BA, *magna cum laude*

## Admissions and qualifications

- California
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the District of Colorado
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

# Patrick C. Maxcy

## Partner



Partner

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## Overview

Patrick Maxcy practices in Dentons' Restructuring, Insolvency and Bankruptcy practice. He represents creditors and other significant stakeholders in Chapter 11 cases, out of court restructurings and cross border insolvency proceedings. Patrick has particular experience representing insurers and other parties in mass tort related bankruptcies and out-of-court proceedings.

## Experience

### Insurance and Mass Tort Experience

- Patrick regularly advises insurance companies in all aspects of the protection of their interests in bankruptcy cases throughout the country, including assertion of claims by and against the insurer, preservation of rights relating to non-debtor parties and other matters relating to the insurer-insured relationship.
- Patrick represents insurance companies holding in excess of \$1 billion of subrogation claims in the Pacific Gas & Electric Corp. bankruptcy case, the largest Chapter 11 utility bankruptcy in US history.
- Patrick represents an insurer in the Imerys Talc America bankruptcy case in connection with matters related to insurance coverage of Imerys and its affiliates.
- Patrick advises certain insurance companies in connection with potential coverage issues arising from their insureds' liability arising from opioid manufacturing and distribution, including in the Purdue Pharmaceuticals bankruptcy case.
- Patrick currently represents or has represented insurance companies in numerous bankruptcy cases of religious organizations caused by sexual abuse claims asserted against clergy.
- Patrick represented the insurer in the Chapter 7 bankruptcy case of C.P. Hall Company, an asbestos distributor, resolving the insurer's alleged coverage obligations through a settlement and policy buy-back agreement approved by the bankruptcy court
- Patrick represented the directors & officers and various related entities in the cross-border bankruptcy and

## Other Experience

- Patrick represented the foreign insolvency administrator for Lehman Brothers Bankhaus A.G. in connection with the Lehman Brothers bankruptcy cases, negotiating numerous agreements to resolve billions of dollars of contractual claims between the US Lehman estates and their German affiliate.
- Patrick is a member of Dentons' multi-disciplinary team representing Verity Health Systems in its Chapter 11 bankruptcy case, including by overseeing the wind down and sale of assets of Verity Medical Foundation.
- Patrick represented the German purchaser of assets from bankrupt toy distributor Hobbico in a Section 363 sale transaction.
- Patrick represented Bluberi Corporation, a Canadian gaming manufacturer and distributor, in its Chapter 15 bankruptcy proceedings.
- Patrick represented the purchaser of a bankrupt steel company in a Section 363 transaction for the sale of substantially all of the debtor's assets.
- Patrick has worked for numerous creditor committees, including the Official Committee of Unsecured Creditors in the United Airlines, Inc. and the Federal Mogul bankruptcy cases.
- Patrick counsels directors and officers, private equity sponsors and other non-debtor affiliated parties in connection with their rights and obligations in bankruptcy cases.
- Patrick represents professional services firms in connection with their engagements as professionals in bankruptcy and restructuring matters.
- Patrick regularly participates in panels and presents CLE programs on insurance and bankruptcy topics throughout the country.

## Activities and Affiliations

### Memberships

- Member, American Bankruptcy Institute
- Member, Turnaround Management Association

### Prior and Present Employment

- Prior to joining Dentons, Patrick clerked for Chief Judge Mark W. Vaughn at the United States Bankruptcy Court, District of New Hampshire.
- Patrick is a past director of the University of Maine School of Law Alumni Association.

## Areas of focus

### Practices

- Cross-Border Restructuring Matters

- Insurance Related Insolvencies
- Real Estate
- Restructuring, Insolvency and Bankruptcy

## Industry sectors

- Insurance
- Cannabis

## Education

- School of Law, University of Maine, 1999, JD, *cum laude*
- University of Maine, 1993, BA, with high distinction

## Admissions and qualifications

- Illinois
- Maine
- US Court of Appeals for the First Circuit
- US District Court for the District of Maine
- US District Court for the Northern District of Illinois

# Robert E. Richards

## Partner



Partner

Chicago

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## Overview

Bob Richards is chair of Dentons' Global and US Restructuring, Insolvency and Bankruptcy practice groups and practices in the areas of bankruptcy and insolvency-related transactions and litigation. His practice includes Chapter 11 representations, distressed asset acquisitions, distressed loan purchases and foreclosure sales, and out of court transactions and transaction structuring. Bob is recommended by *Chambers USA* (2018), where he is praised as "a superb attorney with great legal skills and a creative mind, someone who gets things done and overcomes hurdles." He is also recommended in *Best Lawyers Illinois* (2018) and *The Legal 500 US* (2014-2015), which notes his "first rate technical skills as well as first rate business skills." BTI Consulting Group surveyed in-house counsel and named Bob as a BTI Client Service All-Star (2015) in recognition of his superior client service.

## Experience

He has been heavily involved in numerous Chapter 11 debtor representations in various industries in numerous jurisdictions, including AmCom General Corporation (radio station, D. Del.), Central Hardware Company (retail hardware, ED Mo.), Custom Shop Corp. (custom clothes, D. Del.), Digital Teleport, Inc. (telecom, ED Mo.), Eddie Hagggar, Ltd. (women's apparel manufacturer/wholesaler, ND Tex.), First Merchants Acceptance Corp. (subprime auto lender, D. Del.), Grossman's Inc. (retail hardware, D. Del.), Handy Andy Home Improvement Centers (retail hardware, ND Ill.), Mission Independent Practice Association (managed health care organization, ND Cal.), NewComm Wireless Services (telecom, D. Puerto Rico), Northstar Aerospace (defense subcontractor, D. Del.), Philip Services Corporation (scrap metals, hazardous waste disposal and industrial cleaning, SD Tex.), Preserve at Woodland Harbor (single asset real estate, ND Ill.), Rotec Industries, Inc. (specialized construction equipment leasing and sales, D. Del.), Specialty Equipment Companies (food equipment manufacturer, ND Ill., Rockford Division) and Sonoran Energy, Inc. (oil and gas production, ND Tex.).

Bob has represented Official Committees of Unsecured Creditors in cases such as UAL Corp. (airline), Wickes, Inc. (lumberyards), Xechem, Inc. (pharmaceuticals), and Regal Cinemas, Inc. (theaters).

Bob also regularly represents private equity funds and other acquirers of financially distressed businesses and loans including in enforcement matters.

Industry experience includes construction, energy, financing, health care, manufacturing and distribution, media and

## Recognition

- Ranked in Illinois for Bankruptcy/Restructuring by *Chambers USA* (2015-2019).
- Named in BTI Consulting Group's 2015 BTI Client Service All-Stars in recognition of superior client service.
- Recommended for Corporate Restructuring (including Bankruptcy) by *The Legal 500 US* (2015).
- Recognized by *Best Lawyers in America* (2016-2020), the leading peer-review-based directory of legal practitioners, for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law in Illinois.
- Co-recipient, Small/Medium Turnaround of the Year Award, Midwest Chapter of the Turnaround Management Association (TMA) in recognition of the out-of-court restructuring of SourceLink, Inc., a marketing services firm with multiple US locations.

## Insights

- Co-author, "Bankruptcy Ruling Could Affect LIHTC Properties," *Novogradac Journal of Tax Credits*, Vol. 8 Iss. 8, August 2016
- Co-author, "Current Trends in Oil and Gas Finance," Dentons Global Energy blog, February 18, 2016
- Co-author, "Dancing with the Bear: Challenges for E&P Companies in the Unconventional Oil Market Are Not Quite Over," Dentons' *Game Changers Impacting the US Energy Sector*, 3<sup>rd</sup> ed., July 2015
- Co-author, "Contingency Planning at the Coalface," *Mining Journal*, June 19, 2015
- Author, "Intellectual Property in Bankruptcy and Other Distressed Situations," *ExecSense E-Book*, 2013
- Author, "LIHTC-Related Bankruptcies" Volume II, Issue X, *Novogradac Journal of Tax Credits* 12, 2011
- Co-author, "Reorganizing or Acquiring Businesses Free and Clear of Environmental Liabilities," Chapter in *Managing Environmental Liabilities in Bankruptcy*, Thomson Reuters/Aspatore, 2010
- Co-author, "Practical Issues in Assignments for the Benefit of Creditors," 17 *ABI Law Review* 5, 2009
- Co-author, "The Use of Fraud Examiners in the Battle Against Occupational Fraud and Abuse," Volume 5, Number 3, *The Journal of Investment Compliance* 67, 2004
- Co-author, "Debt Securities" Chapter in *Layman's Guide to the Legal Aspects of Venture Investments*, National Association of Small Business Investment Companies, 6<sup>th</sup> Edition, 1999-2000

## Activities and Affiliations

### Presentations

- Panelist, "The Intersection of Bankruptcy and Environmental Law," Financial Poise Webinars™, May 13, 2020
- Panelist, "Dentons Rodyk Academy Seminars: Implications of the Singapore Insolvency Law reforms for Financial Institutions - the US and English experience and the Australian perspective," Singapore, September 20-22, 2017
- Panelist, "Advanced Bankruptcy Issues," Association of Corporate Counsel, San Francisco, CA, October 18, 2016

- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 139 of 1318
- Co-presenter, "Distressed M&A and Successor Liability," Dentons CLE for In-House Counsel, Chicago, IL, June 8, 2016
  - Testimony on "Potential Single Asset Real Estate Reforms" before the ABI Bankruptcy Code Reform Commission, Dallas, Texas, February 12, 2014
  - Panelist, "LIHTC Related Bankruptcy Issues" Novogradac Affordable Housing Tax Credit Conference, New Orleans, LA, May 16-17, 2013,

## Memberships

- Member, American Bankruptcy Institute
- Member, Turnaround Management Association

## Areas of focus

### Practices

- Distressed M&A, Investing and Debt Trading
- Insolvency Litigation and Enforcement
- Out-of-Court Restructurings and Work-outs
- Restructuring, Insolvency and Bankruptcy

### Industry sectors

- Energy
- Life Sciences and Health Care
- Manufacturing
- Technology
- Cannabis

## Education

- University of Michigan Law School, 1988, JD, *cum laude*
- Johns Hopkins University, 1985, BA, International Studies, Departmental Honors

## Admissions and qualifications

- Illinois
- US Court of Appeals for the Seventh Circuit
- US Court of Appeals for the Tenth Circuit
- US District Court for the Eastern District of Wisconsin
- US District Court for the Northern District of Florida





# Holley Thames Lutz

## Partner



Partner

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## Overview

Holley Lutz concentrates her practice in the areas of Medicare and Medicaid coverage and reimbursement counseling, administrative litigation and clinical research compliance. She represents academic medical centers, community hospitals, large physician groups, hospices and research institutions, as well as a broad array of other health care organizations. In the Medicare and Medicaid arena, Holley:

- Counsels health care organizations with respect to Medicare coverage and reimbursement issues, including those relating to graduate medical education, disproportionate share payment adjustments, and Medicaid financing arrangements including provider-tax and supplemental payment models.
- Represents health care organizations in administrative litigation including PRRB and ALJ appeals.
- Interacts extensively with CMS, obtaining regulatory interpretations and policy clarifications on a wide range of coverage and reimbursement issues.
- Advises clients on formation and operational structure issues, including those relating to compliance with provider-based regulations, provider enrollment, and successor liability in the merger and acquisition context.
- With respect to EMTALA, Holley reviews and revises provider policies and procedures, furnishes in-service training, defends providers against CMS allegations of non-compliance, and negotiates settlement agreements with HHS OIG.

In the clinical research arena, Holley:

- Drafts and revises human subject protection programs, including policies and procedures relating to IRBs generally, IRB member and principal investigator conflicts of interest, and the informed consent process.
- Counsels providers on the application of the Medicare National Coverage Decision relating to services furnished in the context of clinical trials.
- Assists providers in connection with regulatory audits undertaken by ORI, FDA and OHRP, and defends providers against allegations of non-compliance.
- Drafts and negotiates clinical trial agreements with sponsors, CROs and SMOs.

## Recognition

Holley has been recognized by *Chambers USA: America's Leading Lawyers for Business* as one of the leading health care lawyers in the United States, most recently in the 2019 edition. She has been profiled in *Super Lawyers Magazine's* list of top Washington, DC, lawyers for 2012–2019, was recommended in *The Legal 500* in the area of Healthcare in 2013 and 2014, has been recognized by *Best Lawyers in America®* for Health Care since 1991, and was featured on the *Nightingale's Healthcare News* list of "Outstanding Hospital Lawyers—2008."

## Insights

- Co-author, "US Centers for Medicare & Medicaid Services answers COVID-19 questions on hospital industry stakeholder call," Dentons client alert, March 23, 2020
- Co-author, "Proposed Rule on Medicaid Fiscal Accountability would dramatically change Medicaid policies," November 13, 2019
- Co-author, "CMS ignores district court ruling and proceeds with planned payment cuts for hospital outpatient clinic visits at off-campus provider-based departments," November 12, 2019
- Co-author, "Medicare cost reporting changes on the horizon," Dentons client alert, May 4, 2018
- "Condition Code 44 - Operational Challenges Abound with CC44," *Reimbursement Advisor*, Vol. 25, No. 9, May 2010
- Chapter author, "Clinical Research Reimbursement," *2009 Medicare and Medicaid Reimbursement Update*, April 2009
- "Hot Issues In Clinical Trials: Enforcement of Federal Grant Accounting," July 2008
- "Scientific Misconduct - Revised and Revisited by ORI," May 2008
- "Clinical Research: Medicare Coverage, Payment and Compliance Issues," April 2008
- "When Does a Sponsor's 'Promise to Pay' in the Clinical Trial Setting Trigger Medicare Secondary Payer Liability?," *BNA Medical Research Law and Policy Report*, Vol. 6, No. 20, October 17, 2007
- "CMS' Proposed Decision Memorandum on the Clinical Research Policy," *BNA Medical Research Law and Policy Report*, Vol. 6, No. 11, June 8, 2007
- "CMS' Proposed Decision Memorandum on the Clinical Research Policy," *BNA Life Sciences Law and Industry Report*, Vol. 1, No. 7, June 8, 2007
- "Clinical Research: Medicare Coverage, Payment and Compliance Issues," March 2007
- Chapter co-author, "Institutional Review Boards: Their Role and Responsibilities in Clinical Research Programs," *Clinical Research Compliance Manual*, 2006
- "State Law: The New Paradigm of Clinical Research," *Clinical Trials Advisor*, Vol. 9, No. 10, May 27, 2004
- "Medicare Prescription Drug, Improvement and Modernization Act of 2003 and Its Impact on Hospitals," December 2003
- "Are You Ready?," EMTALA Final Rules and Interim Interpretive Guidance, November 2003
- Co-author, "OHRP Unveils Proactive Compliance Reviews," September 2002
- Chapter co-author, "Hospital Reimbursement Issues," *Health Law Handbook*, 1998

# Activities and Affiliations

## Presentations

- "Keeping Clinical Trails on the Right Track: An Overview of Clinical Trials and Human Subjects Research in the Community Hospital" - AHLA Annual Meeting and In-House Counsel Program (July 2013)
- "Partnering Towards Common Goals - Academic Medical Center and For Profit Collaboration" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2013)
- "Research Misconduct and Actions Relevant to Academic Medical Centers" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2012)
- "Medical Necessity: Case Study Regarding Physician Services in Hospitals" - AHLA Annual Meeting and In-House Counsel Program (June 2011)
- "Clinical Trials Update: Legal, Ethical and Operational Perspectives on MSP and Subject Injury, Clinical Trial Coding and Medicare Advantage Beneficiaries" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2011)
- "The Impact of Healthcare Reform Legislation on Medicare, Medicaid and CHIP" - AHLA's Healthcare Reform Program (December 2010)
- "How Do I Conflict You? Let Us Count The Ways" - AHLA Annual Meeting and In-House Counsel Program (June 2010)
- "Payment System Reform: Public Program Reform" - Healthcare Reform: The Law and Its Implications - AHLA (May 2010)
- "We Thought We Knew How to Get Paid, OR What's Old is New Again" - 11th Annual Conference on Emerging Issues in Healthcare Law - ABA (February 2010)
- "What's Old is New Again...Medicare Reimbursement/Enforcement Initiatives that TH/AMCs Should Keep on the Radar" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2010)
- "Conflicts of Interest in Clinical Research, Enforcement Initiatives and FCA Update" - AHLA Annual Meeting and In-House Counsel Program (June 2009)
- "Fraud and Abuse Risks in Non-Academic Research Settings" - HCCA Compliance Institute (April 2009)
- "Research Misconduct: How Did We Get in this Mess and How Can We Avoid it in the Future" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2009)
- "Medicare Clinical Research Policy: Coverage and Payment Issues and Arguments" - AHLA Institute on Medicare and Medicaid Payment Issues (January 2009)
- "CMS's Latest Guidance on Research Billing. The Good, the Bad and the Really Ugly" - HCCA Web Conference (December 2008)
- "Hospital-Acquired Conditions in Inpatient and Outpatient Settings" - CMS Listening Session (December 2008)
- "Quality Reporting and the Move toward Value-Based Purchasing: Opportunities and Challenges" - ABA Washington Healthcare Summit (November 2008)
- "CMS's Latest Guidance on Research Billing. The Good, the Bad and the Really Ugly" - HCCA Research Compliance Conference (October 2008)

- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 144 of 1318
- "Hot Issues in Clinical Trials: Enforcement of Federal Grant Accounting" - AHLA Annual Meeting (July 2008)
  - "Scientific Misconduct - Revised and Revisited by ORI" - AHLA Life Sciences Institute (May 2008)
  - "Clinical Research: Medicare Coverage, Payment and Compliance Issues" - AHLA Institute on Medicare and Medicaid Payment Issues (April 2008)
  - "Clinical Investigations: Institutional Review Boards (IRBs), Informed Consent, and the Investigational Device Exemption (IDE) - Food and Drug Law Institute (November 2007)
  - "Federal Grant Accounting: Compliance and Enforcement" - HCCA Research Compliance Conference (October 2007)
  - "CMS' Draft Decision Memorandum on the Clinical Research Policy" - AHLA Teleconference (May 2007)
  - "Enforcement and Federal Grant Accounting" - Society of Research Administrators International Midwest Section Meeting (May 2007)
  - "Compliance Issues in Industry Clinical Trials - Effort, Third-Party Billing, Unreimbursed Expense, Large Balances: Need We Say More?" - Financial Research Administration Conference (April 2007)
  - "Clinical Research: Medicare Coverage, Payment and Compliance Issues" - AHLA Institute on Medicare and Medicaid Payment Issues Conference (March 2007)
  - "Effort Reporting - The Latest Developments and Recent Cases" - HCCA Annual Research Compliance Conference (September 2006)
  - "Fraud in Clinical Research - Anti-Kickback and Stark Law Issues" - Pennsylvania Bar Institute Clinical Research Symposium (August 2006)
  - "Clinical Research: Medicare Coverage, Payment and Compliance Issues" - HCCA Compliance Institute (March 2006)
  - "Legal Issues in Medicare Reimbursement of Clinical Trial Services - Recent Developments" - AHLA Teleconference (February 2006)
  - "OIG Model Compliance Guidance for PHS/NIH Awardees" - AHLA Audio Conference (January 2006)
  - "Scientific Misconduct - Revised and Revisited by ORI" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2006)
  - "Effort Reporting and Compliance" - HCCA Annual Research Compliance Conference (June 2005)
  - "Federal Research Grants" - HCCA Audio Conference (February 2005)
  - "IRB Challenges and Compliance Tips" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2005)
  - "Fraud and Abuse and Clinical Research" (3-hour workshop) - CBI's Forum on Limiting Exposure to Liability in Clinical Trials (December 2004)
  - "Federal Research Grants: Strategies to Comply with Billing Rules and Avoid False Claims Allegations" - HcPro Audio Conference (October 2004)
  - "Interaction between Medicare Part B and Medicare Part D" - National Medicare Prescription Drug Congress (February 2004)
  - "Litigation and Clinical Trials" - Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions - AHLA (January 2004)
  - "Understanding State Human Subjects Protections Laws Applicable to Clinical Research" - CBI's Forum on Limiting Exposure to Liability in Clinical Trials (December 2003)

- Chairperson of CBI's Forum on Limiting Exposure to Liability in Clinical Trials (December 2003)
- "Clinical Research Compliance" - GCD Biotech and Healthcare Strategies for Success Seminar (February 2002)
- "Compliance Issues and Clinical Research" - Healthcare Corporate Compliance Symposium in Atlanta, Georgia (May 2001)

## Memberships

- American Bar Association, chair, Payment and Reimbursement Interest Group
- American Health Lawyers Association, vice chair, Research/Educational Programs
- American Health Lawyers Association, Teaching Hospital and Academic Medical Centers Program Committee
- American Health Lawyers Association, co-chair, Life Sciences Planning Committee
- *Journal of Health and Life Sciences Law*, editorial board

## Areas of focus

### Industry sectors

- Academic Medical Centers
- Biotechnology Companies
- Health Care
- Life Science Research Entities
- Life Sciences and Health Care
- Medical Device Companies
- Pharmaceutical Companies
- Regulatory Counseling
- Graduate Medical Education

## Education

- University of Mississippi, 1994, JD, *magna cum laude*, Phi Kappa Phi
- Mary Washington College, 1989, *cum laude*

## Admissions and qualifications

- District of Columbia
- Virginia

# Robert P. Barbarowicz

## Counsel

Counsel

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## Overview

Bob has more than 30 years of experience in navigating insurance companies in their corporate, transaction and regulatory matters. He has extensive experience in structuring, negotiating and closing complex transactions for insurance clients, including M&A, corporate finance, capital extraction, reorganizations and reinsurance transactions.

Bob guides large insurance and financial institution clients through regulatory matters at the federal and state level across the US, with particular focus on property and casualty, life, title, and surplus lines carriers. These services include navigating investigations and market conduct examinations, force-placed insurance, rate regulation, rate filings, and regulatory approvals. As an active participant of the National Association of Insurance Commissioners (NAIC) meetings, Bob is at the forefront of insurance regulatory developments.

Bob developed his business acumen and deep insurance industry knowledge after spending 11 years as a business executive and chief insurance regulation executive for Balboa Insurance Group, and prior to that, as executive officer and general counsel of National Information Group and its insurance subsidiary, the Great Pacific Insurance Company. Bob also served as Executive Vice President and General Counsel of The Ahmanson Insurance Companies.

## Experience

Bob's experience, both with and prior to joining Dentons, includes:

- Advising insurers regarding COVID-19 issues and stay at home orders in California.
- Served as lead counsel in representing a major California property and casualty insurer and its subsidiaries in the negotiation of their acquisition by a major mutual insurance company.
- Advised and represented a major mutual insurance company on California regulatory issues in its acquisition of an insurer commercially domiciled in California.
- Served as lead counsel in representing a major California title insurer in its redomestication to another

- Represented and advised three of the four largest writers of lender placed insurance on matters related to investigations of lender placed insurance by the New York Department of Financial Services and other insurance regulators.
- Advised insurers on the use of specialty insurance in rate applications in California rate filings in lieu of more restrictive rate application provisions.
- Advised and represented insurers on matters related to surplus lines insurance.
- Advised insurers regarding various regulatory issues related to the 2017 and 2018 California wildfires.

## Recognition

### Honors and Awards

In 2010, Bob was appointed by the New York Superintendent of Insurance to be a member of the group that advises the Superintendent on modernization of insurance filings in New York. His recommendations on improving the rate filing process, together with the other members of the Personal Lines sub-committee, are part of the December 2010 Insurance Filings Modernization Initiative Report to the Superintendent of Insurance.

## Activities and Affiliations

### Memberships

- American Property Casualty Insurance Association (APCIA)
- Surplus Lines Law Group
- Insurance Industry Charitable Foundation (Western Division Board of Directors)
- Penn State Law (University Park Board of Advisers & Development Counsel)
- Queen of Angels Foundation (Director)

## Areas of focus

### Practices

- Corporate
- Securities and Corporate Finance
- Securities and Corporate Finance in the United States

### Industry sectors

- Insurance
- Insurance Regulation

## Education

## Admissions and qualifications

- California
- Pennsylvania



# Lori Mihalich-Levin

## Partner



Partner

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## Overview

Lori Mihalich-Levin (She/Her/Hers) is a partner in Dentons' Health Care practice and a resident of the Washington, DC, office. She focuses her practice on Medicare reimbursement counseling, with a special focus on Medicare graduate medical education (GME) payments to teaching hospitals. She represents academic medical centers, teaching hospitals, community hospitals, and health systems, as well as a broad array of other health care organizations. In the Medicare area, Lori:

- Counsels health care organizations with respect to Medicare coverage, reimbursement and compliance issues, including those relating to graduate medical education, disproportionate share payment adjustments, patient status, electronic health record incentive payments, price transparency and hospital inpatient and outpatient payment policies.
- Counsels hospitals and health systems regarding the establishment of new medical residency programs.
- Interacts extensively with the Centers for Medicare and Medicaid Services (CMS), obtaining regulatory interpretations and policy clarifications on a wide range of reimbursement issues.
- Advises clients on formation and operational structure issues, including those relating to compliance with provider-based regulations and transition of Medicare-funded GME positions in the merger and acquisition context.

Lori is also the Chair of the Flexibility and Family Leave Task Force of the firm's Women LEAD initiative, through which she is committed to championing the success of diverse attorneys in all stages of their careers.

## Recognition

### Honors and Awards

- 2018 Flex Success Award Honoree, Diversity & Flexibility Alliance
- Named a "Rising Star" in health care in the 2016 edition of *Super Lawyers*
- 2014 Association of American Medical Colleges Spirit of Excellence award (awarded to 3 out of 600+)

# Insights

- Co-author, "Medicare cost reporting changes on the horizon," Dentons client alert, May 4, 2018
- Co-author, "FY 2019 IPPS proposed rule contains GME-related provisions," Dentons client alert, April 25, 2018
- Co-author, "House of Representatives reintroduces resident rotator legislation," Dentons client alert, December 14, 2017
- Co-author, "The Teaching Health Center Graduate Medical Education Program," Dentons client alert, November 2, 2017
- Co-author, "CMS now auditing Section 5503 slot awards," Dentons client alert, April 6, 2017
- Co-author, "Medicare Emergency Affiliated Group Agreements: Helping Medical Residents in Disaster Areas Continue Their Training," *Medicare Report (BNA)*, October 2017
- GME in the IPPS Final Rule: Medicare GME slots now up for grabs from three closed hospitals, September 1, 2016
- Court decision spotlights necessary steps to preserve PRRB jurisdiction, August 4, 2016
- Can moonlighting residents trigger Medicare GME caps, June 16, 2016
- Seeing your first Medicare GME dollars, May 5, 2016
- In IPPS rule, CMS proposes changes for urban teaching hospitals with rural training track programs, April 19, 2016
- HRSA reveals new tool for rural GME, April 12, 2016
- Congress introduces bipartisan legislation to help teaching hospitals with vexing "resident rotator" issue, March 14, 2016
- What the President's FY 2017 budget request says about GME, March 3, 2016
- The Single GME Accreditation System and Medicare GME funding: A new set of challenges, January 7, 2016
- The Medicare payment basics of becoming a new teaching hospital, December 17, 2015
- Recent provider-based legislative changes: Any GME implications?, November 19, 2015
- Be careful with resident rotators: What you don't know might hurt your hospital's ability to receive Medicare GME payments in the future, October 22, 2015
- Medicare GME payments and hospital mergers: A hotbed of issues, September 24, 2015
- House Ways and Means proposes to turn IME payments into a fixed "pool", August 19, 2015
- *Becoming a New Teaching Hospital: A Guide to the Medicare Requirements*, Association of American Medical Colleges, 2012, 2013, and 2014 editions
- *Medicare Payments for Graduate Medical Education: What Every Medical Student, Resident, and Advisor Needs to Know*, Association of American Medical Colleges, 2013 edition
- "Home Health Agencies Should Ensure Proper Reporting of Prior Hospitalizations," *Dennis Barry's Reimbursement Advisor*, January 2009

- "Bidding Farewell to the Signature Stamp," *Dennis Barry's Reimbursement Advisor*, November 2008
- "CMS Takes Next Step Toward Fully Bundled ESRD PPS," *Dennis Barry's Reimbursement Advisor*, April 2008
- "Appeals Court Finds Against Hospital in Suit Involving Payment for Ambulance Transfers," *Dennis Barry's Reimbursement Advisor*, August 2007
- "CMS Releases Options Paper on Value-Based Purchasing," *Dennis Barry's Reimbursement Advisor*, June 2007
- "IDEs, Clinical Trials, and Items Provided Free of Cost: CMS, Manualizes Its Billing Instructions," *Dennis Barry's Reimbursement Advisor*, March 2007

## Activities and Affiliations

### Presentations

- "Becoming a New Teaching Hospital: Medicare Considerations," Association of American Medical Colleges (AAMC) Group on Regional Medical Campuses (GRMC) Spring Meeting, March 29, 2016
- "Graduate Medical Education: Medicare Regulations and Ruminations", American Health Lawyers Association (AHLA) Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions Conference, Washington, DC, March 15, 2016
- "The Medicare Maze for New Teaching Hospitals," St. Mary's Health Care System Seminar for New Teaching Hospitals in Georgia, Athens, GA, December 10, 2015
- "Medicare GME Funding and New Training Programs", University of Vermont Health System Seminar for Leadership Team, Burlington, VT, January 27, 2015
- "Graduate Medical Education: Regulations and Ruminations Following the Release of the IOM Report", American Health Lawyers Association (AHLA) Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions Conference, Washington, DC, January 23, 2015
- "Medicare GME Funding: Current Rules, Growth Opportunities, and a Look to the Future", presentation to residency program directors, University of Virginia Health System, Charlottesville, VA, November 19, 2014
- "The Medicare Maze: When Payment Policy Meets Health System Reform and Other Tales from Washington", Learn, Serve, Lead: The AAMC Annual Meeting, Chicago, IL, November 10, 2014
- "Becoming a New Teaching Hospital: Medicare Rules", Learn, Serve, Lead: The AAMC Annual Meeting, Chicago, IL, November 9, 2014
- "2015 IPPS/OPPS Payment Rules, Part II: The Can't Miss Issues – From the Industry's Perspective", AHLA Regulation, Accreditation and Payment (RAP) Practice Group Webinar, September 30, 2014
- "Hospital Price Transparency Update", presentation to the AAMC's Council of Teaching Hospitals and Health Systems (COTH) Administrative Board, Washington, DC, September 16, 2014
- "GME Payments: Today and In New Payment Models", presentation to the AAMC Advisory Panel on Health Care, Washington, DC, September 10, 2014
- "The Intersection of Price Transparency and Societal Benefit: Implications for Academic Medical Centers", Healthcare Financial Management Association (HFMA) Academic Medical Center Chief Financial Officers Meeting, Las Vegas, NV, June 24, 2014
- "GME Policy Update: News from the Legislative and Regulatory Worlds", AAMC Group on Resident Affairs Spring Meeting, Phoenix, AZ, May 5, 2014

- "Educating Residents on the Costs, Price, and Value of Care", presentation to the AAMC Advisory Panel on Health Care, Washington, DC, April 17, 2014
- "Medicare Funding of Graduate Medical Education: A Primer and the Physician Shortage", AHLA Medicare Medicaid Institute, Baltimore, MD, March 27, 2014
- "GME: Everything You Always Wanted to Know about Medicare Medical Education Payments But Were Afraid to Ask Your Reimbursement Manager", Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions Conference, Washington, DC, January 23, 2014
- "Medicare Maze: When Payment Policy Meets Health System Reform and Other Tales from Washington", AAMC Annual Meeting, Philadelphia, PA, November 3, 2013
- "Graduate Medical Education Funding", Keynote, Society of Academic Anesthesiology Associations (AAAS) Annual Meeting, Philadelphia, PA, November 1, 2013
- "Federal Medicare Funding for Graduate Medical Education", Forum on Expanding Graduate Medical Education at Texas Hospitals, Austin, TX, August 25, 2013
- "GME: Hospitals and Residents Feel the Pinch with Greater Funding Challenges and Increased Competition for Slots", Legal Issues Affecting Academic Medical Centers and Other Teaching Institutions Conference, Washington, DC, January 25, 2013
- "GME Bootcamp Webinar Series, Part IV: New Programs", AHLA Webinar, December 6, 2012
- "Healthcare Legislation and Regulations: Impact on Academic Medical Centers and Teaching Hospitals", Presentation to Leadership at University of Pittsburgh Medical Center, Pittsburgh, PA, October 26, 2012
- "Meaningful Use, Quality, and Associated Risks", Annual Massachusetts Institute of Technology (MIT) Chief Data Officer and Information Quality Symposium, Boston, MA, July 18, 2012
- "GME Financing: National View", Association of Hospital Medical Education (AHME) Annual Educational Institute, Fort Lauderdale, FL, May 17, 2012
- "Medicare Funding of Graduate Medical Education: Primer and a Look into the Future", AHLA Institute on Medicare and Medicaid Payment Issues, Baltimore, MD, March 29, 2012
- "Medicare Funding of Graduate Medical Education: Fundamentals and the Future", American Society of Clinical Oncology Annual Meeting, Chicago, IL, June 5, 2011
- "State of the Academic Clinical Enterprise", Learn, Serve, Lead: The AAMC Annual Meeting, Denver, CO, November 5, 2011
- "DGME and IME Update", Metro New York Healthcare Financial Management Association Meeting, Long Island, NY, September 24, 2010
- "HIT Incentives: American Recovery and Reinvestment Act (ARRA) and Health Information Technology (HIT): Where are We Now?", Spring Meeting of the AAMC Group on Information Resources (GIR), Phoenix, AZ, May 1, 2010
- "HIT Incentives: CMS Proposed Meaningful Use Rule and ONC Interim Final Rule Standards and Certification", Presentation to Scott and White Leadership Team, Temple, TX, February 23, 2010
- "Health Information Technology in the United States", Presentation to Chinese Delegation, Washington, DC, October 28, 2009
- "Show Me the Money: ARRA Payments to Healthcare Providers", AHLA Annual Meeting, Washington, DC, June 30, 2009

## Memberships

- Member, American Health Lawyers Association (AHLA)
- Member, Healthcare Financial Management Association (HFMA)
- Member, Health Section, District of Columbia Bar Association (served elected 3-year term on Health Law Section Steering Committee and as Co-Chair of New Practitioners Committee)
- Member, Women's Bar Association of the District of Columbia

## Prior and Present Employment

Prior to joining Dentons, Lori served as Director, Hospital and GME Payment Policies, at the Association of American Medical Colleges (AAMC) in Washington, DC where she acted as lead regulatory advocate for member teaching hospitals on Medicare reimbursement and graduate medical education (GME) payment policies. Prior to joining the AAMC, Lori worked at a number of other major law firms.

After graduating from law school, Lori was a law clerk to Judge Neal E. Kravitz in Superior Court of the District of Columbia, Washington, DC.

## Areas of focus

### Practices

- Health Care
- Health Care Regulation
- Health Care Advocacy
- Life Sciences
- Public Policy and Regulation

### Industry sectors

- Academic Medical Centers
- Government
- Government Agencies
- Health Care
- Life Science Research Entities
- Life Sciences and Health Care
- Nonprofit Entities
- Regulatory Counseling
- Graduate Medical Education

## Education

- Georgetown University Law Center, 2005, JD, *cum laude*, *The Georgetown Journal of Gender and the Law*, Health Care Section Editor
- Institut d'Etudes Politiques d'Aix-en-Provence, 2002, Certificat d'Etudes Politiques (CEP), Political Science,

- Princeton University, 2001, BA, Public and International Affairs, *magna cum laude*, honors *Phi Beta Kappa*, Herrick Prize for Best Senior Thesis in the Woodrow Wilson School and Sénateur Maman Prize for Best Senior Thesis in the French Department.

## Admissions and qualifications

- District of Columbia
- US District Court for the District of Columbia

## Languages

- English
- French

# Ramy Fayed

## Partner



Partner

Washington, DC  
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## Overview

Ramy Fayed is a partner in the Health Care Practice Group in Dentons US LLP's Washington, D.C. office. He has been recognized by *Super Lawyers*, *Nightingale's Healthcare News*, and *Best Lawyers* as one of the leading health care lawyers in the US. In his practice, he advises a broad range of health care organizations, including hospitals, academic medical centers and manufacturers of pharmaceuticals and medical devices on compliance with the federal health care program anti-kickback law, the Stark law, the False Claims Act, and Medicare and Medicaid compliance and reimbursement issues. He routinely counsels clients on requirements surrounding inpatient admissions, physician supervision requirements, billing rules for outpatient observation services, and issues related to "provider-based" status. Ramy provides strategic advice and assists clients in conducting internal reviews to evaluate the existence of potential overpayments, and to make appropriate self-disclosures and voluntary refunds to federal payors.

Ramy frequently counsels health care systems, technology companies, and other providers and suppliers on compliance with the HIPAA privacy, security, and breach notification requirements, as well as state and other requirements related to the confidentiality and security of data. He regularly works with clients to address privacy and security best practices and respond to data breaches and other privacy and security incidents. Ramy also provides strategic counseling on health care data use issues including data aggregation, data analytics, and de-identification.

Ramy also assists clients in responding to, and complying with, investigations and audits undertaken by federal and state regulatory and enforcement agencies. He also represents clients in administrative litigation, including Provider Reimbursement Review Board (PRRB) and administrative law judge (ALJ) appeals. He also represents academic medical centers and institutional review boards (IRBs) on clinical research-related issues, including drafting and revising human subject protection programs, policies and procedures relating to IRBs generally, IRB member and principal investigator conflicts of interest and the informed consent process.

## Recognition

### Honors and Awards



- Recognized by *Best Lawyers in America*®. Healthcare (2020)
- Named Rising Star, *Expert Guides to the Leading US Lawyers*, Healthcare, 2014
- Washington, DC, Super Lawyer, *Super Lawyers* magazine, 2013-2014
- Outstanding Young Healthcare Lawyers, *Nightingale's Healthcare News*, 2009

## Insights

- Co-author, "CMS issues coverage and payment guidance related to COVID-19," Dentons client alert, March 10, 2020
- Co-author, "CMS ignores district court ruling and proceeds with planned payment cuts for hospital outpatient clinic visits at off-campus provider-based departments," November 12, 2019
- Co-author, "Federal district court interprets Stark Law's "writing" requirement ," Dentons client alert, March 21, 2017
- Author, "The CMS Overpayment Rule: Has the Pendulum Swung Too Far?," *BNA Medicare Report*, 23 MCR 300, March 16, 2012
- *The Stark Law: A User's Guide to Achieving Compliance*, 2nd Edition, HCPro, September 2009
- "US Supreme Court to Weigh in on FCA Public Disclosure Bar," *Journal of Health Care Compliance*, September-October 2009
- "CMS Implements Potentially 'Sweeping' Changes to Stark Regulations," *BNA Health Care Fraud Report*, Vol. 12, No. 19, September 24, 2008
- "The Memorial Health Settlement: Good Law or Bad Lore?," *Journal of Health Care Compliance*, Vol. 10, No. 5, September-October 2008
- "An Overview of CMS's Latest Proposed Changes to the Stark Regulations," *BNA Health Care Fraud Report*, Vol. 12, No. 10, May 7, 2008
- "When Does a Sponsor's 'Promise to Pay' in the Clinical Trial Setting Trigger Medicare Secondary Payer Liability?," *BNA Medical Research Law and Policy Report*, Vol. 6, No. 20, October 17, 2007
- "Phase III Regulations Result in Dramatic Changes to Stark Law," *BNA Health Law Reporter*, Vol. 16, No. 40, October 11, 2007
- "The Stark Law — This Dog Is Not Just Barking Anymore," *Journal of Health Care Compliance*, September-October 2007
- "CMS Proposes Significant Changes to Stark and Related Regulations," *BNA Health Care Fraud Report*, Vol. 11, No. 16, August 1, 2007
- "Patient Privacy Court Cases," *Report on Patient Privacy*, January-August 2007
- Contributing author, *The Stark Law: A User's Guide to Achieving Compliance*, HCPro, September 2005
- "HIPAA and Secondary Research: Oil and Vinegar?," *Teaching Hospitals and Academic Medical Centers*, Vol. 3, Issue 1, January 2005
- "State Law: The New Paradigm of Clinical Research," *Clinical Trials Advisor*, Vol. 9, No. 10, May 27, 2004
- "Disease and Care Management: Impact of Privacy Rule," *Topics in Health Information Management: HIPAA Privacy*, Part II, Vol. 22, No. 4, 2002



# Activities and Affiliations

Main Document

Page 157 of 1318

- Adjunct Faculty, "Medicare Coverage, Payment and Compliance," University of Virginia School of Law, Fall 2020

## Presentations

- "Provider Audit Contractors: An Overview of CMS Contractors and Practical Tips for Audits," *American Health Lawyers Association, Institute on Medicare and Medicaid Payment Issues*, Baltimore, MD, March 26, 2014
- "Overpayments: The Proposed Regulations and How to Prepare for a Less Forgiving Future," Dentons webinar, March 20, 2012
- "Developing and Implementing Standards for Health Care Quality and Patient Safety," The World Health Care Congress Middle East, December 10, 2012
- "Reform Implications for Hospitals and Health Systems," SNR Denton webinar, June 9, 2010
- "CMS Medicare RAC Strategy: Process: Understanding and Preparation," SNR Denton webinar, October 15, 2009
- "Dealing With the Medicare Secondary Payer Rule in the Context of Research Billing," HCCA Compliance Institute, April 26–29, 2009
- "Ancillary Services in Urology: Opportunities and Challenges Under the Stark II, Phase II Regulations," American Urological Association Annual Meeting, Orlando, FL, May 18, 2008
- "HIPAA: Privacy, Security and Beyond," American Health Lawyers Association Fundamentals of Health Law Conference, Chicago, December 3, 2007
- "Stark Law Update: The Latest News and Real-World Compliance Strategies," HCPro, Inc., audio conference, September 18, 2007
- "Enforcement and Federal Grant Accounting," Society of Research Administrators 2007 Midwest Section Meeting, May 1, 2007
- "Basic Training for IRB Members and Their Counsel," American Health Lawyers Association teleconference, October 20, 2005
- "Strategies for Subject Recruitment under HIPAA," Understanding the Impact of HIPAA on Clinical Research: Preparing for Enforcement of HIPAA Privacy and Security Guidelines Conference, Tysons, VA, March 17, 2003
- "Clinical Research in the Post-HIPAA World," Understanding the Impact of HIPAA on Clinical Research: Strategies for Navigating HIPAA Privacy and Security Guidelines Conference, Philadelphia, September 26, 2002
- "Privacy Protection and HIPAA Compliance in Phase IV Research," CBI's 3rd Annual Phase IV Clinical Trials Conference, Philadelphia, September 23, 2002

## Memberships

- American Health Lawyers Association
- Health Care Compliance Association
- American Bar Association's Health Law Section
- District of Columbia Bar Association's Health Law Section

# Areas of focus

## Practices

- Privacy and Cybersecurity
- Health Care Regulation

## Industry sectors

- Academic Medical Centers
- Fraud and Abuse Counseling, Investigations and Defense
- Health Care
- Life Science Research Entities
- Life Sciences and Health Care
- Medical Device Companies
- Pharmaceutical Companies
- Regulatory Counseling
- Space Business

## Education

- The George Washington University Law School, 2001, JD, *magna cum laude*
- School of Medicine, Boston University, 1998, MA, Medical Sciences
- Boston College, 1996, BS, Biology

## Admissions and qualifications

- District of Columbia
- Maryland

# Carolyn Richter

## Counsel



Counsel

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## Overview

Carolyn is a member of Dentons' Capital Markets practice. She is a seasoned finance lawyer who blends commercial law and corporate restructuring experience to advise clients on a wide variety of transactions. She closes complex deals, including asset securitizations and other structured financings, including those involving electronic mortgage notes. She has also regularly served as lead counsel on credit facilities, distressed M&A and asset sale transactions, financings involving a tax equity investor such as solar financings, titling trust equipment financings, letter-of-credit transactions and margin loans. She is also well-versed in the legal opinions required in these transactions.

Clients who seek advice, at any stage in a business relationship, on how to mitigate the effects that the insolvency of a counterparty would have on their transactions, and to structure around that risk, will benefit from Carolyn's skillset. She also advises on non-recourse real estate loans that are to be transferred to securitization trusts, and intercreditor issues arising in multi-lender structures.

A resident of Atlanta, Georgia, Carolyn enhances Dentons' Capital Markets practice group in the southeast. She is a Fellow of the American College of Commercial Finance Lawyers and is the Immediate Past Chair of the Bankruptcy Law Section of the State Bar of Georgia, and serves on its Board of Directions. She is admitted to practice in Georgia, Florida and New York. *Best Lawyers* has ranked Carolyn for Securitization and Structured Finance. Carolyn received her JD from Tulane Law School, *cum laude*, where she was a member of the Moot Court Board.

## Experience

### Securitizations

- Issuer's counsel in several notes offerings aggregating over US\$1.5 billion involving the securitization of timeshare promissory notes and mortgages, including electronic mortgage transactions.
- Issuer's counsel in the securitization of trade receivables aggregating US\$900 million of a building products and consumer products manufacturer.
- Counsel to an international manufacturer of agricultural equipment with regards to bankruptcy issues in the

- Issuer's local counsel in the securitization of automobile loans aggregating US\$150 million.
- Counsel to a publicly traded company in connection with the monetization of a US\$50 million secured promissory note by a bankruptcy-remote subsidiary in a private placement offering.
- Advisor on perfecting liens on electronic mortgage notes, including transfers made on a blockchain system.

## International Financings

- Represent British multinational bank as lead arranger and administrative agent in a US\$525 million asset-based secured multi-currency credit facility for a Texas-based chemicals company and its co-borrower affiliates in the UK and the UAE. The facility included an option to increase to \$625 million, and some of Europe's largest financial institutions comprised the syndicate of lenders.
- Counsel to a US private equity lender providing a secured credit facility to a Colombian borrower to originate personal loans, both tangible and electronic, with consumers, and utilizing a titling trust and a custodian to maintain title to and possession or control of the personal loans serving as collateral for the business loan.
- Lender's counsel in asset-based loan with heavy exposure to South American countries, requiring the borrower to purchase trade credit insurance.
- Counsel to a public company that arranged and provided credit support for a US\$200 million loan to a South American subsidiary by a German bank. Credit support included guaranties, letters of credit, put and call arrangements, and required consideration of international tax issues.
- Counsel to a US bank in connection with a US\$24 million letter of credit facility provided to support the account party's redemption obligations to equity holders of a British publically-held corporation.

## M&A Transactions

- Counsel to Chapter 11 corporate debtors in connection with the sale of their businesses, including transactions involving mortgage loan originations and the trucking industry.
- Counsel to creditors seeking to utilize an M&A transaction or 363 asset sale by the borrower in order to liquidate assets, including advising US banks and trustees for defaulted bond issuances.
- Counsel to real estate developers in joint venture transactions involving commercial properties encumbered by secured debt, including securitized mortgage loans with change of control restrictions.

## Term and Revolving Credit Facilities

- Counsel to lenders and borrowers in connection with numerous loan facilities secured by personal and real property assets, including acquisition facilities, bridge loans, unitranche structures and letter-of-credit facilities.

## Letters of Credit

- Counsel to the issuer of US\$350 million of commercial paper secured by a direct-pay letter of credit and for which the issuer's reimbursement obligations were supported by a secured credit facility.
- Counsel to a temporary employment agency in connection with a US\$100 million letter of credit facility obtained for the issuance of letters of credit to support its worker's compensation insurance requirements.
- Counsel to a national bank in connection with a US\$24 million letter of credit facility provided to support the account party's redemption obligations to equity holders.
- Analyze issues involving commercial and standby letters of credit and advise on disputes.

- Counsel to a national bank and its affiliate equipment finance company in connection with numerous sale/leasebacks of solar panels, including advice on a defaulted financing to a San Francisco-based solar developer.
- Counsel to a publicly traded company in sale/leaseback transactions involving the lease of a manufacturing facility and related equipment and the issuance of US\$150 million of debt via pass-through trust certificates.
- Counsel to a national bank providing a US\$35 million revolving credit facility to an owner of fleets of trucks to be leased to big box stores, including utilizing a Delaware titling trust to own and pledge the truck titles to the bank; also advised bank as agent for other warehouse lenders.
- Counsel to a national leasing company in connection with the workout of a US\$17 million equipment lease obligation owed by a US steel company.

## Bankruptcy-Remote Transactions

- Close transactions using bankruptcy-remote entities to mitigate counterparty credit risks.
- Advise on Bankruptcy Code safe harbors in derivative transactions.
- Advise on contract terms to enhance client's position in the event the counterparty becomes bankrupt.

## Financing for Technology Companies

- Lead counsel to a national bank in the Chapter 11 reorganization of a software company, including handling software licensing issues, inventor claims, perfection in the technology, and source code escrow arrangements.
- Counsel to a national bank in connection with a US\$100 million revolving credit facility for an Internet-based energy commodity trading company.

## Hedge Funds/Margin Loans

- Counsel to a national bank in connection with a US\$160 million margin-loan revolving credit facility secured by a pledge of shares in the general partner of various US and foreign hedge funds.

## DIP Financing and Cash Collateral

Counsel to borrowers and lenders in connection with debtor-in-possession credit facilities, the negotiation of cash collateral terms, and exit financing in Chapter 11 bankruptcy cases. Examples are:

- Counsel to car-haul trucking company in its Chapter 11 case, handling matters such as the company's DIP financing, cash management systems, and real property lease assumption and rejection terms, and in its previous bankruptcy case handled its DIP and exit financing. DIP loans were given super-priority lien status and had a delayed-draw format, permitting an initial one-time advance but permitting future advances to enable the company to maintain an agreed amount of cash on hand, within budget constraints.
- Counsel to national bank as bond trustee in Chapter 11 case of detention center, handling the terms for the use of cash collateral and the sale of the company's assets in a 363 sale to a buyer approved by the bond trustee.
- Counsel to national bank in Chapter 11 case of a technology company, which permitted the company to use cash collateral of the pre-petition lenders within budget guidelines, but imposed cash collateral restraints on the junior pre-petition lender in accordance with pre-petition intercreditor agreement.

Experienced in legal opinions required for financing transactions. Examples are:

- True sale opinions, including when the transferor is a FDIC-insured bank that is not eligible to be a debtor in a bankruptcy case and thus the analysis is under the Federal Deposit Insurance Act and FIRREA.
- Non-consolidation opinions.
- No preference opinions.
- Safe harbor opinions under the US Bankruptcy Code.

## UCC Foreclosures

- Conduct numerous public and private foreclosure sales, and deed-in-lieu of foreclosure dispositions, for various financial institutions and other secured parties.

## Financing Involving Government Sponsored Entities (GSE)

- Counsel to national banks in connection with sales of secured promissory notes to GSEs.
- Counsel to mortgage broker in connection with sales of consumer mortgage loans to GSEs.
- Counsel to national bank in connection with a revolving credit loan secured by Ginnie Mae securities.

# Recognition

## Honors and Awards

- *Best Lawyers in America*, Securitization and Structured Finance Law (2009–2016)
- Listed in Legal Elite for Bankruptcy/Creditors' Rights by *Georgia Trend Magazine* (2005, 2011-2014)
- Listed in *Georgia's Best Lawyers* (2009-2014)
- Recipient of Martindale-Hubbell's highest rating for legal ability and ethical standards.
- Listed in The Legal Elite List for Business Law in *Georgia Trend Magazine* (2019)

# Insights

## Publications

- Co-author, Chapter 4 on Bank Deposits and Collections (UCC Article 4) and Chapter 9 on Secured Transactions (UCC Article 9), *American Jurisprudence Treatise on the Uniform Commercial Code in Georgia*.
- Co-author, "How Does Losing the Absolute Right to Credit Bid in a Sale under a Plan of Reorganization Impact Lenders and Borrowers?" *Pratt's Journal of Bankruptcy Law*, Vol. 6 No. 3 at 274 (2010).

# Activities and Affiliations

## Presentations

- Moderator, "Views From the Bench - The Ever Changing Landscape of Chapter 11," International Women's

- Interviewer, "How High is Your Technology IQ? Professionalism and Cyber Security," Georgia State Bar Bankruptcy Conference, Lake Oconee, Georgia, November 5, 2015
- Program Author, "Ethical Dilemmas in Bankruptcy Cases," Georgia State Bar Bankruptcy Conference, Lake Oconee, GA, November 6, 2015
- Speaker, "Bankruptcy Issues in Loan Transactions and Workouts," American Bar Association's Loan Workouts and Bankruptcy Litigation Subcommittee, Los Angeles, CA, April 12, 2014
- Speaker, "When the Financing Party isn't on the 'Sunny Side' of Solar: Hot Issues and Enforcement of Remedies in Solar Financing," American Bar Association's Creditors' Rights Subcommittee, Los Angeles, CA, April 11, 2014
- Program Chair and Moderator, "The Outer Limits of Collective Action," American Bar Association's Bankruptcy Litigation Subcommittee, Los Angeles, CA, April 10, 2014
- Program Chair and Moderator, "A Practitioner's Guide to Trends in True Sale and Other Structured Finance Opinions," American Bar Association's Securitization and Structured Finance Committee, Federal Regulation of Securities Committee, Law and Accounting Committee and Legal Opinions Committee, Washington, DC, November 22, 2013
- Speaker, "When the Financing Party Isn't on the 'Sunny Side' of Solar: Hot Issues and Enforcement of Remedies in Solar Financing," American Bar Association's Creditors' Rights Subcommittee, Banking Law Subcommittee and Bankruptcy Litigation Subcommittee, San Francisco, CA, August 10, 2013
- Speaker, "Structural and Legal Considerations/Concerns for Solar, Wind and Other Renewable ABS Deals," Information Management Network's First Annual Sunshine Backed Bonds Conference, New York, NY, May 3, 2013
- Speaker, "Disclosure Issues in Loan Workouts," *Questions You Never Used to Ask: Emerging Ethical and Liability Concerns in Commercial Loan Workouts* CLE program, American Bar Association's Banking Law Committee, Commercial Finance Committee, and Securitization Committee, Boston, MA, April 16, 2011
- Speaker, "Re-Structured Financing: Voluntary and Involuntary Changes to Deal Structures," American Bar Association's Commercial Finance Committee, Denver, CO, April 23, 2010
- Speaker, "Loan Workouts: Achieving Desired Tax Results, While Not Losing Sight of Business Considerations," The American Bar Association's Committee on Taxation, Chicago, IL, July 31, 2009
- Moderator, "Hands Across the Borders - A Comparison of the Insolvency Laws of the United States, Canada and Mexico," American Bar Association's Commercial Finance Committee, Vancouver, BC, April 17, 2009
- Moderator, "Structuring Transactions to Mitigate Insolvency Risks: Use and Limitations of Escrow Agreements, Letters of Credit, Security Deposits and Other Mechanisms," American Bar Association's Creditors' Rights and Bankruptcy Litigation Subcommittees, Washington, DC, March 15, 2007
- Moderator, "Critical Questions to Ask When Analyzing a Transaction: Practice Pointers Derived From Recent Trends in True Sale and Substantive Consolidation," American Bar Association's Creditors' Rights and Bankruptcy Litigation Subcommittees, Atlanta, GA, August 7, 2004
- Speaker, "Special Problems and Issues in Dot-Com Bankruptcies," Georgia Institute of Continuing Legal Education's program on "Workouts, Turnarounds and Restructurings," Atlanta, GA, February 15, 2001
- Speaker, "Issues Arising in a Problem Loan Situation," Lorman Education Services' seminar on "Commercial Lending Requirements and Loan Documentation in Georgia," Atlanta, GA, August 24, 2000

## Memberships



- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 164 of 1318
- Former Chair of the Bankruptcy Law Section, State Bar of Georgia (2015-2017)
  - Fellow, America College of Commercial Finance Lawyers; former Chair of Fellows Nominating Committee and Regent on its Board of Regents
  - Member, American Bar Association; former Chair of Bankruptcy and Creditors' Rights subcommittee
  - Member, ABA Business Law Section Working Group on Volcker Rule Opinions and Risk Retention Opinions

## Areas of focus

### Practices

- Banking and Finance
- Capital Markets
- Corporate
- Restructuring, Insolvency and Bankruptcy

### Industry sectors

- Accommodation: Hospitals, Schools, Retirement Homes, Prisons and Government Buildings
- Commercial Banks
- Distressed Asset Investors
- Financial Institutions
- Project Finance
- Real Estate
- Renewable Energy
- Tax Credits and Tax-Advantaged Investing

## Education

- Tulane University, 1987, JD, *cum laude*, Moot Court Board
- Newcomb College of Tulane University, 1984, BA, President of student senate; received Class of 1909 Award for the outstanding graduating senior

## Admissions and qualifications

- Georgia
- New York



# Susan Banks

## Partner



Partner

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## Overview

Susan Banks, a member of Dentons' Health Care practice, advises health care providers and suppliers on the full range of Medicare and Medicaid compliance and reimbursement issues. She also helps clients navigate the complexities of health care delivery reform and the rapidly evolving federal regulatory environment.

Susan frequently advises clients on matters involving the calculation of prospective payment system (PPS) rates and coverage and billing rules for various items and services. Her recent engagements have included advising clients regarding:

- Medicare cost-reporting rules
- Outpatient physician supervision requirements
- Billing for services furnished by midlevel practitioners
- Medical necessity of inpatient admissions
- Inpatient admission order requirements
- Rules to qualify for provider-based status and related billing and payment rules
- Scope of the diagnosis-related group (DRG) three-day payment window
- Appropriate uses of advance beneficiary notices (ABNs) and hospital-issued notices of noncoverage (HINNs)

Susan has extensive experience with graduate medical education (GME) reimbursement and contracting requirements, and with the establishment of new medical and dental residency programs. She also advises clients on the requirements for participating in the 340B Drug Discount Program.

Susan assists clients in conducting internal investigations of compliance and reimbursement matters and, when appropriate, making self-disclosures and voluntary refunds. She also has experience advising and representing clients in government investigations and civil and criminal litigation involving allegations of fraud and abuse arising under the federal False Claims Act, Stark Law and Anti-Kickback Statute. Susan has represented clients in connection with investigations and audits undertaken by federal and state regulatory and enforcement agencies

Susan regularly drafts on clients' behalves comment letters for submission to various state and federal administrative bodies. She also assists providers in filing appeals with the Provider Reimbursement Review Board (PRRB) and participates in administrative hearings before the board.

## Recognition

- Recognized as a "Washington, DC, Rising Star" in health care law, *Super Lawyers*, 2016, 2017, and 2018

## Insights

- Co-author, "CMS ignores district court ruling and proceeds with planned payment cuts for hospital outpatient clinic visits at off-campus provider-based departments," Dentons client alert, November 12, 2019
- Co-author, "Medicare cost reporting changes on the horizon," Dentons client alert, May 4, 2018
- Co-author, "FY 2019 IPPS proposed rule contains GME-related provisions," Dentons client alert, April 25, 2018
- Co-author, "House of Representatives reintroduces resident rotator legislation," Dentons client alert, December 14, 2017
- Co-author, "Tying GME Funding to Quality Metrics," Dentons client alert, November 30, 2017
- Co-author, "The Teaching Health Center Graduate Medical Education Program," Dentons client alert, November 2, 2017
- Co-author, "CMS now auditing Section 5503 slot awards," Dentons client alert, April 6, 2017
- Co-author, "Medicare Emergency Affiliated Group Agreements: Helping Medical Residents in Disaster Areas Continue Their Training," *Medicare Report (BNA)*, October 2017
- Co-author, "CMS Now Auditing Section 5503 Slot Awards," *AHLA Weekly*, April 2017
- Contributing author, *Representing Hospitals and Health Systems Handbook*, First Edition, AHLA Publication, August 2016
- Co-author, "Providers and Patients Pay the Price When CMS Plays Doctor," *AHLA's Fraud and Abuse Newsletter (5:1)*, February 2016
- "HRSA Proposes Big Changes in 340B Omnibus Guidance," *Reimbursement Advisor*, October 2015
- Co-author, "When the Delivery of Medically Necessary Services May Expose Your Hospital to False Claims Act Liability," AHLA's Fraud and Compliance Forum, course materials, September 2015
- "Do Residents Need Their Own NPIs?," *Reimbursement Advisor*, June 2015
- "NCDs May Pose Compliance Risk," *Reimbursement Advisor*, April 2015
- "Bundling of Preadmission Emergency Services for Patients Admitted to Inpatient Psychiatric Facilities," *Dennis Barry's Reimbursement Advisor*, November 2014
- Co-author, "Medicare Reimbursement for Discarded Drug Amounts in Single-Dose Vials," *Dennis Barry's Reimbursement Advisor*, October 2014
- Co-author, "MA Payors, Questionable Readmission Policies," *Dennis Barry's Reimbursement Advisor*,

- Co-author, "Telehealth: A Promising, but Still Uncertain, Business Case," *Law360*, June 19, 2014
- Co-author, "CMS Uncompensated Care Policy," *Dennis Barry's Reimbursement Advisor*, April 2014
- Co-author, "New GME Programs: Traps for the Unwary," *Dennis Barry's Reimbursement Advisor*, December 2013
- Co-author, "Pros and Cons Of A Medicare Pay-for-Performance Model," *Law360*, November 25, 2013
- "Pushing the 340B Envelope," *Dennis Barry's Reimbursement Advisor*, April 2013
- Contributing author, "2013 Medicare IPPS/LTCH Final Rule," American Health Lawyers Association Member Briefing, December 2012
- "Readmissions Adjustment and Medicare Part C," *Dennis Barry's Reimbursement Advisor*, November 2012
- Co-author, "Clinic and ED Visit Billing Under Hospital Outpatient PPS," *Dennis Barry's Reimbursement Advisor*, October 2012
- "ICD-10: Implications for Provider Reimbursement," *Dennis Barry's Reimbursement Advisor*, May 2012
- "2011 OPPOS Relaxes Physician Supervision Standard," *Dennis Barry's Reimbursement Advisor*, February 2011
- "May 11 Deadline to Resolve Past FTE Determinations," *Dennis Barry's Reimbursement Advisor*, October 2010
- "PPACA on Unused Residency Slots," *Dennis Barry's Reimbursement Advisor*, October 2010
- Co-author, "Providers Rack up RAC Wins," *Dennis Barry's Reimbursement Advisor*, September 2010
- "PPACA Modifies FTE Count Rules," *Dennis Barry's Reimbursement Advisor*, September 2010
- "CMS Clarifies Physician Supervision Requirements," *Dennis Barry's Reimbursement Advisor*, August 2010
- "New Rules on Mental Health Parity," *Dennis Barry's Reimbursement Advisor*, April 2010

## Activities and Affiliations

- Co-instructor, "Medicare Coverage, Payment and Compliance," University of Virginia School of Law, Fall 2018
- Co-instructor, "Medicare Coverage, Payment and Compliance," University of Virginia School of Law, Spring 2017

## Presentations

- "GME Update: Payment and Policy," American Dental Education Association, Annual Meeting, March 18, 2017
- "GME Update: Payment and Policy," American Dental Education Association, Annual Meeting, March 12, 2016
- Co-presenter, "Mega Changes Proposed in HRSA's 340B Mega-Guidance," American Health Lawyers Association webinar, September 15, 2015
- "GME Update: Payment and Policy," American Dental Education Association, Annual Meeting, March 7, 2015
- Co-presenter, "Graduate Medical Education – Regulations and Ruminations Following the Release of IOM

- “GME Update: Payment and Policy,” American Dental Education Association, Annual Meeting, March 17, 2014
- Co-presenter, “GME Funding—Concerns for Oral and Maxillofacial Surgery Training,” American Association of Oral and Maxillofacial Surgeons, Annual Meeting Faculty Summit, October 7, 2013
- “GME Update: Payment and Policy,” Keynote Address, American Dental Education Association, Sections on Business & Finance and Clinic Administration, Mid-Year Meeting, October 11, 2012
- Co-presenter, “SCOTUS Has Spoken, Part II: The Status of ACOs, Payment Reform Initiatives, and the Expansion of the Medicaid Program,” American Health Lawyers Association webinar, July 12, 2012

## Memberships

- Colorado Bar
- District of Columbia Bar
- Virginia State Bar (Associate Member)
- American Bar Association
- American Health Lawyers Association

## Areas of focus

### Practices

- Health Care

### Industry sectors

- Litigation, Arbitration, Mediation and other Dispute Resolution
- Regulatory Counseling
- Academic Medical Centers
- Fraud and Abuse Counseling, Investigations and Defense
- Health Care
- Life Sciences
- Graduate Medical Education

## Education

- University of Virginia, 2009, JD
- Northwestern University, 2000, BA

## Admissions and qualifications

- Colorado
- District of Columbia
- Virginia
- US Court of Appeals for the District of Columbia Circuit
- US District Court for the District of Columbia

## Languages

- English

# Nicholas Kappas

## Partner



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## Overview

Nick is a member of Dentons' Tax practice group. He concentrates his practice on federal tax planning for federal and state tax credit transactions and tax-exempt and taxable bonds.

Nick has represented clients on tax credit transactions involving new markets, historic rehabilitation and low-income housing tax credits, as well as on related federal and state tax matters including tax credit syndication and tax-exempt organizations.

Nick has substantial experience in federal tax matters in the area of tax-exempt bond financing for state and local governments, and he regularly participates in tax-exempt and taxable municipal financings, including general obligation, revenue, leasehold revenue, and private activity bonds. He has represented bond issuers and underwriters in connection with new money bonds, refunding bonds, conduit financings, and taxable or tax credit bonds. Nick advises clients on key tax issues pertaining to tax-exempt or taxable bond financings and strives to provide creative yet practical solutions to ensure a successful transaction.

## Recognition

### Honors and Awards

- Ranked, *Legal 500 US*, Non-Contentious Tax, 2020

## Insights

- Co-author, "Section 45Q initial guidance released for carbon capture projects," Dentons client alert, February 26, 2020.
- Co-author, "New guidance clarifies aspects of the Opportunity Zone program," Dentons client alert, April 23, 2019

# Activities and Affiliations

## Memberships

- American Bar Association Tax Section
- Missouri Bar Association Tax Law Section
- National Association of Bond Lawyers
- New York State Bar Association Tax Section

## Areas of focus

### Practices

- Tax Credits and Tax-Advantaged Investing
- Tax
- Opportunity Zones
- Partnerships and Other Pass-Through Entity Taxation

### Issues and opportunities

- Global tax guide to doing business in...

## Education

- Washington University in St. Louis School of Law, 2007, LL.M., Taxation
- New York Law School, 2002, JD, *cum laude*
- Colgate University, 1991, BA

## Admissions and qualifications

- Missouri
- New York

# Peter Stockburger

## Partner



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San Diego

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## Overview

Peter Stockburger is a partner at Dentons, and is a member of the Firm's global Employment, Intelligence and Strategic Services, and Data Privacy groups. Peter's practice focuses on the unique intersection between cybersecurity, data privacy, employment law and complex commercial litigation.

Peter regularly advises clients on a range of cutting-edge legal issues, including cybersecurity resiliency and preparedness, cyber gap and risk assessments under various information security frameworks (e.g., NIST, HITRUST, ISO), developing automated license plate reader (ALPR) programs and policies, reviewing and updating data privacy programs and performing gap and risk assessments against various domestic and global legal regimes (e.g., Illinois Biometric Privacy Act (IBPA), European Union's General Data Protection Regulation (GDPR), and California's Consumer Privacy Act of 2018 (CCPA)), technology contract review and negotiation, complex workplace disputes (e.g., wage and hour disputes, harassment / discrimination complaints, LGBTQ workplace policies), and other difficult business questions. Peter also has extensive experience handling trade secret and breach of contract disputes before all level of courts and administrative agencies. He has been recognized as a Rising Star by Southern California *Super Lawyers Magazine* every year since 2015.

Peter is also a frequent author and speaker. He regularly speaks to groups such as the NATO Cooperative Cyber Defence Centre of Excellence (NATO CCDCOE) in Tallinn, Estonia; the American Society of International Law; the US Cyber Institute at West Point; the Southern California Association of Corporate Counsel; the National Employment Law Council; the Daily Journal; CONNECT; and the San Diego Maritime Alliance. He publishes extensively with publications such as *NATO CCDCOE*, the *Daily Journal*, *Law360*, *Today's General Counsel*, *Bloomberg*, and academic publications such as the *American University Journal of International Law*. And he recently participated as an expert in cybersecurity on projects commissioned by the University of Leiden in the Netherlands, the University of Exeter in the United Kingdom, and the NATO CCDCOE.

In addition, Peter has an active *pro bono* practice. He successfully acquired legal status for refugees from Haiti, Mexico and Egypt before US Immigration Courts. He co-authored several *amicus* briefs in the US Supreme Court, Fourth Circuit Court of Appeal, Ninth Circuit Court of Appeal, and the Illinois Supreme Court on behalf of high-profile clients such as former Obama administration cabinet officials, the former United Nations Special Rapporteur on Torture, the American Bar Association, and a broad coalition of anti-domestic abuse advocacy groups in Illinois. And he was awarded the Wiley W. Manuel Certificate for Pro Bono Legal Services from the State Bar of California in 2015 and 2017, the Pro Bono Publico Award from Casa Cornelia in 2016, and was co-named LAF's 2017 OP



Previously, Peter worked in the office of the prosecutor for the United Nations International Criminal Tribunal for the Former Yugoslavia, where he served on the trial team prosecuting former Croatian General Ante Gotovina. He also served as a “virtual fellow” with the US Department of State, where he provided counsel to the US embassy in Mexico City on international labor issues. Since 2009, Peter has served as an adjunct professor at the University of San Diego School of Law teaching in the areas of public international law, oral advocacy and cyber law, where he also serves as an advisor to the University of San Diego School of Engineering and Center for Cyber Security Engineering and Technology.

## Experience

### Cybersecurity and data privacy

- **Global online-based wine distributor:** CCPA compliance and review of data privacy and information security programs.
- **Domestic telecommunications and cable company:** CCPA compliance.
- **Domestic fintech SaaS provider:** CCPA compliance and SaaS contract review / negotiation.
- **Domestic sports data company:** Information security resiliency gap assessment and program review, and SaaS contract review / negotiation.
- **Domestic property management company:** ALPR compliance, CCPA compliance.
- **Global cloud provider:** Compliance with data subject access requests, DMCA takedown requests, and contract review / negotiation.
- **Global digital advertising company:** CCPA compliance.
- **Global medical device manufacturer:** Company-wide cybersecurity risk assessment.
- **Global personal product manufacturer and distributor:** GDPR risk assessment and compliance program review, CCPA compliance.
- **Global real estate company:** GDPR compliance, including privacy program review.
- **Global transportation company:** GDPR compliance, including compliance program review.
- **Global title insurance and insurance company:** CCPA compliance, privacy program review, and cybersecurity gap assessment.
- **Global retail company:** IBPA compliance and gap assessment, CCPA compliance.
- **Global herbal product manufacturer:** IBPA compliance and gap assessment.

### Employment and labor

- **Domestic housing provider:** FLSA collective action defense.
- **Domestic real estate appraisal company:** Misclassification / joint employer class action defense.
- **International government contractor:** Successful defense of multiple discrimination complaints, with favorable pre-trial settlements.
- **Nationwide electronics retailer:** Successful defense of wage and hour class action. Class certification denied, and settled on an individual basis.
- **Nationwide electronics retailer:** Successful defense of wage and hour collective action under the Fair Labor Standards Act. Conditional certification denied, and settled on an individual basis.

- **Nationwide electronics retailer:** Successful defense of multiple wage and hour disputes before the California Labor Commissioner. Complete defense determinations.
- **Regional agricultural company:** Successful defense of dispute before the California Labor Commissioner. Complete defense determination.
- **Private trust:** Successful defense of wage and estate dispute. Summary adjudication granted, settled on favorable terms.
- **International government aerospace contractor:** Successful defense of union avoidance campaign.
- **International commercial aerospace company:** Successful defense of union avoidance campaign.

## Complex litigation

- **Domestic marketing company and executives:** Defense of breach of contract and misappropriation claims.
- **Domestic gaming company:** Defense of breach of contract and misappropriation claims.
- **National government contractor:** Successful defenses of multimillion-dollar trade secret dispute over high electromagnetic pulse technology. Secured a favorable pre-trial settlement.
- **Global "Internet of Things" company:** Successful prosecution of source code–related trade secrets dispute. Secured a favorable pre-trial settlement.
- **Global construction company:** Served as second chair for a two-week trial concerning a breach of contract dispute.
- **International chemical company:** Successfully defended in a multimillion-dollar taxpayer action. Secured dismissal via summary judgment, pending appeal.
- **National construction company:** Successfully defended a multimillion-dollar public works dispute; obtained an arbitral award.

## Pro bono

- **Asylum claims:** Successfully acquired legal status for refugee applicants from Mexico, Haiti and Egypt in both affirmative and defensive asylum hearings.
- **Amicus brief on behalf of former Obama administration officials, including former cabinet officials:** *Gloucester County School Board v. G.G.* (US Supreme Court, 4th Circuit Court of Appeal) - case concerning gender identity and bathroom access.
- **Amicus brief on behalf of former Obama administration officials, including former cabinet officials:** *Bostock v. Georgia / Express, Inc. v. Zarda / R.G. & G.R. Harris Funeral Homes, Inc. v. EEOC* (US Supreme Court) - cases concerning LGBTQ protections under Title VII.
- **Former UN Special Rapporteur on Torture:** *Aurelio Vargas Gutierrez v. Barr* (9th Circuit Court of Appeal) - case concerning mental health exceptions to Convention Against Torture.
- **American Bar Association:** Filed an amicus brief in *Jennings v. Rodriguez* (US Supreme Court), a case concerning the constitutionality of federal immigration detention standards.
- **Anti-domestic violence groups:** Filed an amicus brief in *People of the State of Illinois v. Gray* (Illinois Supreme Court), a case concerning the constitutionality of a domestic violence protection statute.

# Recognition

## Honors and Awards

- "Rising Star," Southern California Super Lawyers, 2015–2019
- State Bar of California Wiley W. Manuel Certificate for Pro Bono Legal Services, 2015, 2017
- Casa Cornelia Pro Bono Publico Award, 2016
- LAF's OP Appeals Project Volunteer Attorney of the Year, 2017

## In the Media

- "International Law and Conflict in Cyberspace: Attribution, Consequences, and the Development of Norms," *CyberWire*, 2017
- "Colorado joins New York in requiring data security standards for financial sector," *Third Certainty*, 2017
- "ABA Tells Justices to Uphold 9th Circ. Immigrant Bond Ruling," *Law360*, 2016
- "Attorneys are paying attention to diversity in law firms," *Bay Area Reporter*, August 11, 2016
- "ABA program examines legal ramifications of transgender troops in the military," ABA, August 2, 2016

## Insights

- Lead author, "DOL releases new proposed independent contractor rule," Dentons client alert, September 24, 2020
- Lead author, "EEOC Clarifies That ADA Prohibits Employers From Requiring Antibody Tests For Returning Employees," Dentons client alert, June 18, 2020
- Lead author, "Supreme Court issues landmark Title VII ruling protecting sexual orientation and gender identity," Dentons client alert, June 16, 2020
- Lead author, "Keeping Your Eye On The Ball: California Localities Increase Minimum Wage Effective July 1, 2020," Dentons client alert, June 11, 2020
- Co-author, "Filling in the Gap - California State and City Supplemental Paid Sick Leave Measures," Dentons client alert, April 30, 2020
- Lead-author, "COVID-19: To furlough or to layoff? Three steps to guide employers in making the tough call (United States)," Dentons client alert, March 31, 2020
- Lead author, "COVID-19: Furloughs, layoffs, and hours reductions under the federal WARN Act (United States)," Dentons client alert, March 23, 2020
- Lead author, "COVID-19: What Employers Need to Know About California's "Stay at Home" Order (United States)," Dentons client alert, March 23, 2020
- Lead author, "COVID-19: California governor issues executive order waiving 60 day period for Cal-WARN notices," Dentons client alert, March 20, 2020
- Lead author, "10 new California laws your business must understand for 2020," Dentons client alert, October 22, 2019
- Lead author, "California dreaming, California nightmare - 3 takeaways from California's controversial independent contractor bill becoming law," Dentons client alert and *International Law Office (ILO)*, September 23, 2019
- Lead author, "Tectonic shift - Key takeaways as California Legislature passes controversial independent contractor bill," Dentons client alert, September 12, 2019
- Lead author, "Data privacy enforcement on the rise in the US – California's CCPA setting the benchmark,"

- Co-author, "GDPR One Year Later," *Today's General Counsel*, June 5, 2019
- Co-author, "Are we there yet? California's new privacy law inches closer to the finish line with pending legislative amendments," *Daily Journal* (California), May 8, 2019
- Co-author, "What is 'Reasonable' Under Our New Privacy Law?," *Daily Journal* (California), April 3, 2019
- Co-author, "Illinois Supreme Court clarifies standing under biometrics law: No actual harm needed," Dentons client alert, January 30, 2019
- Co-author, "The California Consumer Privacy Act," *Daily Journal* (California), January 25, 2019
- Lead author, "NIST Announces Privacy Framework Effort," Dentons Privacy and Cybersecurity Law Blog, November 12, 2018
- Lead author, "HHS Announces New Health Sector Cybersecurity Coordination Center," Dentons Privacy and Cybersecurity Law Blog, November 9, 2018
- Lead author, "The Good, Bad and the Ugly: Key Takeaways From California's New Privacy Law," Dentons Privacy and Cybersecurity Law Blog, November 9, 2018
- Lead author, "California Passes First of Its Kind IoT Cybersecurity Law," Dentons Privacy and Cybersecurity Law Blog, November 6, 2018
- Lead author, "From Grey Zone to Customary International Law: How Adopting the Precautionary Principle May Help Crystalize the Due Diligence Principle in Cyberspace," NATO CCDCOE 10th International Conference on Cyber Conflict Proceedings, May 2018
- Lead author, "DHS and FBI Issue Joint Warning: Hackers Have Targeted Critical Sector Industries Since March 2016," Dentons Privacy and Cybersecurity Law Blog, March 27, 2018
- Lead author, "SEC Updates Guidance on Cybersecurity Risk and Incident Disclosure Requirements," Dentons Privacy and Cybersecurity Law Blog, March 26, 2018
- Lead author, "Survey Says...Cybersecurity Remains a Critical Challenge for Business," Dentons Privacy and Cybersecurity Law Blog, March 23, 2018
- Lead author, "IRS Warns About New Cyber Scam Targeting Taxpayers," Dentons Privacy and Cybersecurity Law Blog, March 6, 2018
- Lead author, "NIST Releases Draft Update to Cybersecurity Framework," Dentons Privacy and Cybersecurity Law Blog, December 13, 2017
- Co-author, "*Spokeo One Year Later: Courts Split Over Whether Identity Theft Risk Confers Standing After Data Breach*," *Bloomberg Law*, August 10, 2017
- Lead author, "HHS Issues Quick Response Cyber Attack Checklist," Dentons Privacy and Cybersecurity Law Blog, July 13, 2017
- Lead author, "DHS and FBI - Hackers Are Targeting US Nuclear, Energy, and Manufacturing Facilities," Dentons Privacy and Cybersecurity Law Blog, July 11, 2017
- Co-author, "The Defend Trade Secrets Act One Year Later," *Today's General Counsel*, June 21, 2017
- Lead author, "President Trump's Budget Requests \$1.5B For Homeland Security Cyber Unit," Dentons Privacy and Cybersecurity Law Blog, May 23, 2017
- Lead author, "US Government Accountability Office Releases New Report On The Internet of Things (IoT)," Dentons Privacy and Cybersecurity Law Blog, May 19, 2017
- Lead author, "SEC Issues Cybersecurity Alert for Brokers and Financial Advisers," Dentons Privacy and

- Lead author, "NIST Plans To Examine Internet of Things (IoT) For Its Cybersecurity Framework," Dentons Privacy and Cybersecurity Law Blog, May 17, 2017
- Lead author, "New ABA Opinion - Attorneys Must Take Reasonable Cybersecurity Measures To Protect Client Data," Dentons Privacy and Cybersecurity Law Blog, May 12, 2017
- Lead author, "White House Signs New Cybersecurity Executive Order," Dentons Privacy and Cybersecurity Law Blog, May 12, 2017
- Lead author, "NIST Releases Draft Guidance On Securing Wireless Infusion Pumps In The Healthcare Industry," Dentons Privacy and Cybersecurity Law Blog, May 10, 2017
- Lead author, "HHS Plans To Launch Cybersecurity Center Focused On Medical App Security," Dentons Privacy and Cybersecurity Law Blog, May 10, 2017
- Lead author, "DHS Warns Congress On Mobile Device Security," Dentons Privacy and Cybersecurity Law Blog, May 9, 2017
- Lead author, "FBI Warns Cyber Criminals Are Targeting Unsecured FTP Servers In The Healthcare Industry," Dentons Privacy and Cybersecurity Law Blog, May 3, 2017
- Lead author, "New Mexico Becomes 48th State To Enact Data Breach Notification Law," Dentons Privacy and Cybersecurity Law Blog, May 2, 2017
- Lead author, "Tennessee Adds New Encryption And Timing Requirements To Its Data Breach Notification Law," Dentons Privacy and Cybersecurity Law Blog, April 28, 2017
- Lead author, "Colorado Proposes New Cybersecurity Rules For Financial Advisers," Dentons Privacy and Cybersecurity Law Blog, April 25, 2017
- Lead author, "Control and Capabilities Test: Toward a New Lex Specialis Governing State Responsibility for Third Party Cyber Incidents," NATO CCDCOE, 9th International Conference on Cyber Conflict: CyCon 2017 (2017)
- Co-author, "Spokeo One Year Later: Courts divided over whether the risk of identity theft is sufficient to confer standing to sue in data breach cases," ABA Privacy & Data Security Committee Newsletter (2017)
- Co-author, "The Defend Trade Secrets Act One Year Later - Top Trends & Insights," *Today's General Counsel* (2017)
- Co-author, "Trends & Insights: The Defend Trade Secrets Act Nine Months Later," Dentons client alert, February 28, 2017
- Co-author, "High Court and Transgender Bathroom Access: Quo Vadis?," *Law360*, February 27, 2017
- Co-author, "From Russia, with cybersecurity lessons," *Daily Journal*, February 17, 2017
- Contributor, "Dentons' pick of global regulatory trends to watch in 2017 - Privacy and data protection," Dentons client alert, February 10, 2017
- Co-author, "California Supreme Court rules employees cannot be on-call or on-duty during rest breaks," Dentons client alert, January 3, 2017
- Lead author, "Known Unknowns: Cyber Warfare and The Jus Ad Bellum," *American University International Law Review*, Vol. 31: Iss. 4, Article 2 (2016)
- Lead author, "HHS Issues Warning About Phishing Campaign Disguised As Official Communication," Dentons Privacy and Cybersecurity Law Blog, December 4, 2016
- Co-author, "Federal court puts brakes on DOL's new overtime rule," Dentons client alert, November 30, 2016

- Lead author, "FTC Announces New Guidance on Ransomware," Dentons Privacy and Cybersecurity Law Blog, November 23, 2016
- Lead author, "NIST and USCG Issue New Maritime Industry Cybersecurity Profile," Dentons Privacy and Cybersecurity Law Blog, November 22, 2016
- Co-author, "Trade secret protection under President-elect Trump," Dentons client alert, November 22, 2016
- "Internet of Things (IoT) Security Takes Center Stage at FBI, DHS, NIST and Congress," Dentons Privacy and Cybersecurity Law Blog, November 21, 2016
- "US Officially Blames Russia for DNC Hack," Dentons Privacy and Cybersecurity Law Blog, October 7, 2016
- "White House Issues Presidential Directive Coordinating Government Response To 'Cyber Incidents,'" Dentons Privacy and Cybersecurity Law Blog, September 12, 2016
- Co-author, "Obama administration announces new sex discrimination guidelines for federal contractors," Dentons client alert, August 17, 2016
- Co-author, "Los Angeles and San Diego Increase minimum wage and paid sick leave for employees," Dentons Global Employment Lawyer, Vol. 2, Issue 2, August 17, 2016
- Co-author, "Los Angeles and San Diego set to increase Minimum Wage And Paid Sick Leave for employees effective July 2016," Dentons client alert, June 30, 2016
- Co-author, "5 Steps for Creating An LGBT-Supportive Workplace," *Law360*, June 23, 2016
- Co-author, "Transgender Bathroom Debate: What's the Deference?," *Law360*, May 17, 2016
- Co-author, "How Will Obama's Workplace Legacy Hold Up Post-Election?," *Law360*, May 8, 2016
- Co-author, The Obama administration weighs in on the transgender bathroom debate, Dentons client alert, May 6, 2016
- Co-author, "No Joking Matter: California Ramps Up Enforcement with New FEHA Rules," *Daily Journal*, March 29, 2016
- Co-author, "Are You Ready? New Employment Regulations Hit California April 1, 2016," Dentons client alert, March 18, 2016
- Co-author, Chapter "Fiduciary Duties of Investment Advisers and Broker-Dealers" in CEB Book - Understanding Fiduciary Duties in Business Entities, March 2016
- Co-author, "EEOC seeks to bolster pay discrimination prohibitions via new requirement for large employers to disclose pay data," Dentons client alert, February 1, 2016
- Co-author, "The State and Federal Evolution of LGBT Workplace Rights," *Law360*, January 21, 2016
- Co-author, "Employers beware - US Department of Labor issues a shot across the bow to those using independent contractors," Dentons Global Employment Lawyer, Vol. 2, Issue 2, November 2, 2015
- Co-author, "Shifting Standards: The Changing Fiduciary Landscape for Broker-Dealers and Investment Advisers," *California Business Law Practitioner*, Volume 30, No. 4 (Fall 2015)
- Co-author, "New OFCCP changes to federal contractor pay practices," Dentons client alert, October 7, 2015
- Co-author, "Eleventh Circuit adopts and clarifies 'primary beneficiary' test for unpaid interns under the FLSA," Dentons client alert, October 5, 2015
- Co-author, "The Rise of the Obama Workplace," *Law360*, September 28, 2015
- Co-author, "New executive order mandates paid sick leave for federal contractors," Dentons client alert,

- Co-author, "No extension for you! Employers – brace for the impact of the new DOL overtime rules," Dentons client alert, September 3, 2015
- Co-author, It's back to the future with the NLRB's new 'joint employer' standard, Dentons client alert, August 28, 2015
- Co-author, "Employers beware—US Department of Labor issues a shot across the bow to those using independent contractors," Dentons client alert, July 23, 2015
- Co-author, "Second Circuit weighs in on when unpaid interns become 'employees' under the FLSA," Dentons client alert, July 10, 2015
- Co-author, "California Paid Sick Leave Law Goes Into Effect July 1, 2015," Dentons client alert, June 30, 2015
- Co-author, "Questions remain following US Supreme Court's 'headscarf' ruling," Dentons Global Employment Lawyer, Vol. 1, Issue 3, June 24, 2015
- Co-author, "California Court of Appeal – Out-of-State Forum Selection / Choice of Law Provisions Most Likely Unenforceable in Wage Disputes," Dentons client alert, June 9, 2015
- Co-author, "Questions Remain Following US Supreme Court 'Headscarf' Ruling," Dentons client alert, June 8, 2015
- Co-author, "Ninth Circuit to Corporations - No Blanket Immunity For Violations of International Law," Dentons client alert, September 23, 2014 (with William O'Brien and Ivan Bilaniuk)
- Co-author, "It Pays to be Sick in California," Dentons client alert, September 15, 2014
- Co-author, "DOL to Federal Contractors – Transgender Discrimination is Sex Discrimination," Dentons client alert, August 25, 2014
- Co-author, "New Executive Order Prohibits the Federal Government and Government Contractors From Employment Discrimination Against LGBT Persons," Dentons client alert, July 24, 2014
- Co-author: "Minimum Wage Mania Among Cities And States" *Law360*, July 17, 2014
- Co-author, "California Allows Employment Class Action Waivers; But the PAGA Threat Persists," Dentons client alert, June 26, 2014
- Co-author, 2014 Dentons California Litigation Guide, April 17, 2014
- Co-author, "President Obama Signs Two More Orders Aimed at Federal Contractor Pay Practices," Dentons client alert, April 9, 2014
- Co-author, "Supreme Court Confirms that Severance Payments are Subject to FICA Taxes," Dentons client alert, March 28, 2014
- "Emerging Voices – Is The R2P Doctrine The Greatest Marketing Campaign International Law Has Ever Seen?" *Opinio Juris*, 2013
- "The Responsibility to Protect Doctrine: Customary International Law, An Emerging Norm, or Just Wishful Thinking?" *International Human Rights Law Review*, 5 Int. Hum. Rts. L. Rev. 365, 2010

## Activities and Affiliations

### Presentations

- Moderator, "US COVID-19 top Employment and Labor issues to consider for your return-to-work strategy,"

- Presenter, "Key California employment laws your business must understand for 2020," Dentons webinar, November 19, 2019
- Presenter, "CCPA Update - Time To Get Ready For Compliance," *CONNECT Frameworks Workshop*, San Diego, November 2019
- Presenter, "Cyber Ethics: In-House Counsel's Ethical Role In Data Privacy and Cybersecurity," *Dentons CLE Seminar for In-House Counsel*, St. Louis, June 2019
- Panelist (accepted), "Control and Capabilities Test 2.0: A Closer Look at the New Attribution Test States Are Adopting in Cyberspace," NATO CCDCOE, 11th Conference on Cyber Conflict: CyCon 2019, Tallinn Estonia, June 2019
- Presenter (upcoming), "California Privacy Law - A Closer Look at Compliance," *CONNECT Frameworks Workshop*, San Diego, May 2019
- Panelist, "Key Considerations & Developments in Cybersecurity & Privacy," *Dentons CLE Seminar for In-House Counsel*, Atlanta, March 2019
- Panelist, "California Dreaming, California Nightmare: The CCPA," *Daily Journal Cybersecurity / Privacy 2019 Forum*, Los Angeles, February 2019
- Presenter, "The Good, The Bad & The Ugly - Key Insights On The California Consumer Privacy Act of 2018," *Dentons CLE Seminar for In-House Counsel*, Los Angeles, January 2019
- Presenter, "The Good, The Bad & The Ugly - Key Insights On The California Consumer Privacy Act of 2018," *Dentons CLE Seminar for In-House Counsel*, San Francisco, January 2019
- Co-chair, Class Action Mastery Forum, San Diego, January 2019
- Panelist (accepted), "Control and Capabilities Test: How States Are Adopting a New Test for Attribution in Cyberspace," American Social of International Law Mid-Year Conference, Los Angeles, November 7, 2018
- Presenter, "Privacy, Data Security, and AI Demystified," *CONNECT Frameworks Workshop*, San Diego, September 20, 2018
- Presenter, "Cybersecurity and Data Protection 101: Building a Business for the Future," Maritime Alliance, San Diego, September 14, 2018
- Panelist, "From Grey Zone to Customary International Law: How Adopting the Precautionary Principle May Help Crystalize the Due Diligence Principle in Cyberspace," NATO CCDCOE, 10th International Conference on Cyber Conflict: CyCon 2018, Tallinn, Estonia, June 1, 2018
- Co-chair, *Daily Journal Cybersecurity/Privacy Forum*, Los Angeles, March, 2018
- Moderator, "International Regulatory Trends," *Daily Journal Cybersecurity / Privacy 2018 Forum*, Los Angeles, March 2018
- Moderator, "Cyber Risk Management," *Daily Journal Cybersecurity / Privacy 2018 Forum*, Los Angeles, March 2018
- Presenter, "Control and Capabilities Test: Toward a New Lex Specialis Governing State Responsibility for Third Party Cyber Incidents," *NATO CCDCOE, 9th International Conference on Cyber Conflict: CyCon 2017*, Tallinn, Estonia, June 2, 2017
- Lecturer, "International Law and Cyber Operations: Attribution," *University of San Diego School of Law, International Law Society Lecture Series*, San Diego, April 6, 2017
- Co-presenter, "The Trump Wild Card: What Employers Can Expect From the New Administration," Dentons client webinar, January 26, 2017



- Co-presenter, "Employment Law Goes Local," *Association of Corporate Counsel Luncheon*, San Diego, September 22, 2016
- Panelist, "Transgender Employment Litigation and Diversity in Law Firms" on panel entitled "A Dynamic 'Trans'-ition: A Path Forward on the Recognition of Transgender Rights, Employment Equality and Integration of Transgender Troops Into the US Military," *American Bar Association Annual Conference*, San Francisco, August 5, 2016
- Co-presenter, "FLSA Overtime Regulations," *California Employers Association Webinar*, June 8, 2016
- Guest lecturer, "Cyber Warfare and International Law," University of San Diego School of Law, San Diego, April 2016
- Co-presenter, "FEHA Regulations - What You Need to Know," *California Employers Association Webinar*, April 7, 2016
- Co-presenter, "Trans\* in the Workplace," *California Employers Association Webinar*, October 15, 2015
- Panelist/paper presenter, "Known Unknowns: Cyber Warfare, *Jus Ad Bellum* and International Law, American Society of International Law Annual Research Forum, Washington, DC, October 18, 2015
- Panelist/paper presenter, "Known Unknowns: Cyber Warfare, *Jus Ad Bellum* and International Law," *US Naval Postgraduate School Conference on the Future of Just War*, Monterey, CA, October 14, 2015

## Memberships

- San Diego County Bar Association, Labor and Employment Section
- State Bar of California, Labor and Employment Section

## Prior and Present Employment

Prior to joining Dentons, Peter attended the University of San Diego School of Law where he graduated *cum laude* and was admitted to the National Order of the Barristers. During that time, Peter worked for the United States Attorneys' Office and the United Nations International Criminal Tribunal for the Former Yugoslavia in The Hague, Netherlands.

## Areas of focus

### Practices

- Litigation and Dispute Resolution
- Privacy and Cybersecurity
- Employment and Labor
- Public International Law
- Commercial Litigation
- Class Action Defense
- Internal Corporate Investigations

### Industry sectors

- Digital Media

- Mobile

- Software
- Cloud and Hosting Services
- E-Commerce, Internet and E-Payments
- Medical Device Companies
- Defense and Space
- Retail
- Technology
- Government
- Cannabis

## Issues and opportunities

- Cannabis in the United States

## Education

- University of San Diego School of Law, 2009, JD, *cum laude*, Order of the Barristers
- Texas State University, 2005, BA, *magna cum laude*

## Admissions and qualifications

- California
- United States Supreme Court
- US Court of Appeals for the Fourth Circuit
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

## Languages

- Spanish

# Andrea C. Chang

## Partner



Partner

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## Overview

Andrea Chang is a partner of the Real Estate practice group in the Los Angeles office and San Francisco office. She has been with the firm since 2005. Her practice includes all aspects of a broad range of real estate and finance transactions, with a focus on real estate loan documentation, commercial and industrial loan documentation, participations, syndications, securitizations, workouts, restructuring, maximizing collection on defaulted loans, development, investment, commercial and residential acquisitions, dispositions, leasing and build-to-suit transactions.

Andrea regularly represents lenders and financial institutions in creating forms for new product lines, and documenting loans related to acquisitions, refinancing and construction financing, asset based lending, loan modifications, loan workouts, conduit mortgage loans in a broad range of commercial real estate assets such as multi-family, office, retail, industrial, student housing and hotel projects and other assets.

She also regularly represents public companies, private companies, property management companies and individuals in acquisitions and dispositions of all of the foregoing asset classes, real estate brokerage issues, as well as real estate portfolios and performing and nonperforming notes. Andrea has also served as lead counsel on more than 400 site acquisitions and leases with development and environmental components throughout the nation.

Andrea publicly speaks about matters related to real estate and has published a cover article on real estate receiverships in *Los Angeles Lawyer* magazine.

## Experience

Andrea's high profile deals include, but are not limited to:

- Representation of one of the world's leading conglomerates in the real estate transfer and acquisition of three chains of supermarkets in California and Washington.
- Representation of a publicly traded global client in the acquisition of a landmark property in Los Angeles, Bel Air. The deal is one of the 8th largest deals in Los Angeles history and the largest in 2019.
- Representation of a client in the real estate transfer of a multi-state portfolio of hospitals and medical office

- Representation of a global client in the acquisition of an office building in New Jersey, +\$95 million.
- Representation of an international client in the acquisition of a portfolio of educational centers.
- Representation of one of the world's leading retailers in its' US rollout negotiating purchases and leases of property on more than 400 sites throughout California, Arizona and Nevada.

## Recognition

- Asian Pacific American Women Lawyers Alliance (APAWLA), Celebration of APA Women Partners in LA Law Firms - Honoree, 2016
- *Super Lawyers* - Rising Star, 2009-2019
- *Los Angeles Magazine* - Southern California Top Young Lawyers, 2009-2019
- *Pasadena Magazine* - Top Attorney, 2012-2016
- *Los Angeles Business Journal* - Women Making a Difference, 2014
- *The US Legal 500* - Leading Individual in Real Estate, 2014
- *Bisnow* - 50 Top Power Women in Los Angeles Commercial Real Estate, 2014
- *California Real Estate Women-Los Angeles* (CREW-LA) - One of two women to receive its "Women on the Rise" award in its 30th Anniversary Gala, 2014
- *Super Lawyers* - Top Women Attorneys in Southern California, 2015

## Insights

- "Real Estate Receiverships," Cover article, *Los Angeles Lawyer*, December 2009

## Activities and Affiliations

### Community Involvement and Pro Bono

- Board of Directors - World Trade Center Los Angeles
- Board of Directors - Taiwanese Chamber of Commerce, Los Angeles since 2010

### Presentations

- Speaker, "California Real Estate Development From Beginning to End," Lorman Educational Services, December 2007
- Speaker, "China Real Estate Club's Investment Forum," 2017

### Memberships

- American Bar Association
- World Trade Center Los Angeles
- Commercial Real Estate Women, Board of Directors - Los Angeles (CREW-LA)

- Los Angeles County Bar Association
- State Bar of California (Real Property)
- Los Angeles County Bar Association (Real Property)
- Taiwanese Chamber of Commerce

## Areas of focus

### Practices

- Real Estate
- Real Estate Finance
- Real Estate Leasing Occupation and Operation
- Restructuring, Insolvency and Bankruptcy
- Asset Finance and Lending
- Acquisition Finance

### Industry sectors

- Financial Institutions
- Opportunity Zones

## Education

- University of Southern California, Gould School of Law, 2004, JD
- University of California at Los Angeles, 2001, BA

## Admissions and qualifications

- California

## Languages

- Mandarin

# R. Matthew Garms

## Partner



Partner

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## Overview

R. Matthew Garms joined the firm in 1999 and practices in the Corporate practice, concentrating in mergers and acquisitions and general corporate law.

He has a variety of experience in complex commercial transactions and is part of a team of Dentons lawyers that serves as general counsel for private equity groups and their portfolio companies.

Matthew has worked on the acquisition, divestiture and financing of numerous companies involving a broad range of industry groups, including automotive products, aerospace and aviation products, healthcare products and services, printing, technology and software consulting, telecommunications, construction materials, transportation, specialty plastics, films and packaging, food and beverage, information technology and e-commerce.

## Recognition

### Honors and Awards

- Listed, *Chambers USA: America's Leading Lawyers for Business*, Corporate/Mergers and Acquisitions, Missouri, 2012

## Activities and Affiliations

### Memberships

- Kansas Bar Association
- The Missouri Bar
- Kansas City Metropolitan Bar Association

# Areas of focus

## Practices

- Banking and Finance
- Corporate
- Mergers and Acquisitions
- Securities and Corporate Finance

## Industry sectors

- Automotive
- Aviation and Aerospace
- Financial Institutions
- Health Care
- Life Sciences and Health Care
- Manufacturing
- Private Equity
- Technology
- Cannabis

## Issues and opportunities

- Cannabis in the United States

# Education

- The University of Iowa College of Law, 1999, JD, with high distinction
- College of Business Administration, University of Iowa, 1995, BBA, Economics, with high distinction

# Admissions and qualifications

- Kansas
- Missouri

# Tania M. Moyron

## Partner



Partner

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## Overview

Tania M. Moyron is a partner in Dentons' Restructuring, Insolvency and Bankruptcy group. Tania has significant experience in bankruptcy, corporate restructuring and related litigation matters. She has represented Chapter 11 debtors, creditors' and equity committees, liquidating trustees, principals and secured and unsecured creditors in all aspects of corporate bankruptcy. She also has advised buyers and sellers of assets in bankruptcy and receivership cases, including representation of a publicly traded real estate investment trust (REIT) and restaurant franchise.

Tania's representations span a variety of industries, including health care, retail, entertainment, trucking, commercial and residential real estate and restaurant franchise industries. She also has litigation experience in state and federal courts and appellate experience before the Bankruptcy Appellate Panel for the Ninth Circuit Court of Appeals, District Courts and the Ninth Circuit Court of Appeals.

Prior to joining Dentons, Tania gained experience in complex and challenging Chapter 11 cases at top-ranked national firms for business restructuring and bankruptcy. Tania also served as a judicial and appellate law clerk to the Honorable Christopher M. Klein, Chief Judge for the United States Bankruptcy Court for the Eastern District of California and former member of the Bankruptcy Appellate Panel of the Ninth Circuit Court of Appeals.

## Experience

- **Verity Health System of California, Inc.** (Chapter 11 - Central District of California, August 2018-present): Tania co-leads the firm's representation of this parent not-for-profit company and sixteen affiliated entities, including six significant operating hospitals, in the second largest hospital bankruptcy case in American history. Recently, the Court approved the sale of two hospitals for \$235 million, over the objections of various parties, including the California Attorney General.
- **Air Force Village West, Inc. dba Altavita** (Chapter 11 – California): Representing Air Force Village West, Inc., in chapter 11 proceedings that will pave the way for the sale of its continuing care retirement community. The Riverside, CA-based company, which does business as Altavita Village, filed in the US Bankruptcy Court for the Central District of California. They have lined up a stalking horse bidder, with the consent of the secured creditors, to sell the 220 acre facility for \$58 million in cash and assumption of certain liabilities. A bid procedures motion was approved on May 14, 2019, with an auction to be held on or about June 5, 2019.



- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 189 of 1318
- **Gardens Regional Medical Center & Hospital, Inc.** (Chapter 11, Central District of California, June 2016-October 2018): Tania played a pivotal role in representing this 137 bed not-for-profit hospital in connection with the California Attorney General's appeal of the Bankruptcy Court's sale order. The hospital was initially sold under section 363 of the Bankruptcy Code in a very successful auction (the purchase price went from \$8.5 million to \$19.5 million). The California Attorney General approved the sale, but imposed such onerous economic conditions on the buyer that the sale failed, which led to the hospital's closure. The hospital sold again, now as a closed hospital, for approximately \$7 million, over the objection of the Attorney General. When the Attorney General appealed the sale order, the firm successfully obtained a dismissal of the appeal. The case resulted in three published opinions, all on cutting edge issues of bankruptcy law, and a distribution to unsecured creditors.
  - **Puerto Rico:** Represented the Fiscal Agency and Financial Advisory Authority and the Government Development Bank for the Commonwealth of Puerto Rico regarding its restructuring and revitalization efforts prior to commencement of proceedings under the Puerto Rico Oversight, Management, and Economic Stability Act (PROMESA).
  - **ICPW Liquidation Corp., a Nevada corp., (formerly In re Ironclad Performance Wear Corp.), et al.:** Represented the Official Committee of Equity Holders (and currently the Trustee and the Trustee Board) in chapter 11 jointly-administered cases. The Debtors' assets were sold at auction for \$25.25 million, which is 60 percent more than the stalking-horse bid. Thereafter, the Equity Committee and the Debtors confirmed a joint plan of liquidation that pays unsecured creditors in full and results in significant distributions to equity.
  - **Domum Locis, LLC:** Represented a real estate debtor in successfully restructuring its obligations with its secured lender and emerging from Chapter 11.
  - **Radio personality:** Represented non-debtor spouse and well-known radio personality in contentious litigation instituted by secured lender.
  - **Edenhurst Gallery:** Confirmed a Chapter 11 plan of reorganization for an art gallery operator and a purchaser and seller of fine historic paintings and antiques.
  - **Heller Erhman, LLP:** Represented the Official Committee of Unsecured Creditors in the administration of estate and claims litigation.
  - **South Bay Expressway L.P.:** Represented the California Department of Transportation in the Chapter 11 proceedings of the state's largest public-private partnership, which built a toll road in Southern California.
  - **Consolidated Freightways Corp., et al.:** Represented a Chapter 11 liquidating trustee in Consolidated Freightways Corp. and certain affiliates (the former operator of one of the largest less-than-truckload long-haul freight transportation companies in the United States, which generated more than US\$2 billion in revenues annually) in connection with the administration of the estates, complex insurance litigation and other matters.
  - **Rachel Ashwell Designs, Inc. dba Shabby Chic:** Represented a Chapter 11 debtor (a retailer, manufacturer, licensor and wholesaler of home furnishings, bedding and accessories) in connection with the liquidation of certain retail stores and a structured dismissal.

## Recognition

- Recognized as a "Rising Star" by *Southern California Super Lawyers*, 2013–2015

## In the Media

- "The coronavirus pandemic impact on a hospital bankruptcy," *The Bond Buyer*, April 30, 2020
- "AHMC Healthcare to Buy Two San Francisco-Area Hospitals for \$40 Million" *The Wallstreet Journal*, April 23, 2020
- "Verity Cleared to Sell Two Hospitals," *The Deal*, April 13, 2020

- "Verity Collects Approval to Sell Remaining Hospitals," *The Deal*, April 18, 2019
- "Altavita Village Latest Retirement Community Casualty," *The Deal*, March 12, 2019
- "\$610M Stalking Horse Bid For 4 Verity Hospitals Approved," *Law 360*, February 20, 2019
- "Verity Reveals Sale of Remaining Hospitals," *The Deal*, January 18, 2019
- "Verity Health Collects Bid Procedures Approval," *The Deal*, October 25, 2018
- "Verity to Seek Sale of Hospitals in Chapter 11," *The Deal*, September 1, 2018

## Activities and Affiliations

### Community Involvement and Pro Bono

- Cycle for Survival, Team Lead
- LA Beats Cancer, Board Member

### Presentations

- Panelist, "Today's Health Crisis: Behavioral Health and Opioids," ABI Health Care Program: The New Reality in Health Care
- Panelist, "Litigating Issues in a Health Care Case," 2019 ABI Winter Leadership Conference
- Speaker, "Appellate Ethics and Frivolous Appeals," 4th Annual Bankruptcy Ethics Symposium, Federal Bar Association
- Speaker, "What's up with Attorney Civility?," 5th Annual Bankruptcy Ethics Symposium, Federal Bar Association
- Producer, "Back to the Minefield: (Even More) Ethical Dilemmas Facing Young Insolvency Professionals," California Bankruptcy Forum, Rancho Mirage, California

### Memberships

- Member, American Bankruptcy Institute
- Member, International Women's Insolvency and Restructuring Confederation (IWIRC)
- Los Angeles County Bar Association

## Areas of focus

### Practices

- Restructuring, Insolvency and Bankruptcy
- Creditor and Equity Committee Representation
- Cross-Border Restructuring Matters
- Debtor Representation
- Insolvency Litigation and Enforcement

## Industry sectors

- Distressed Health Care
- Health Care
- Life Sciences and Health Care

## Education

- University of the Pacific, McGeorge School of Law, 2004, Juris Doctor
- University of California, San Diego, 1999, BA

## Admissions and qualifications

- California
- US Bankruptcy Court for the Central District of California
- US Bankruptcy Court for the Eastern District of California
- US Bankruptcy Court for the Northern District of California
- US Bankruptcy Court of the Southern District of California
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Northern District of Texas

## Languages

- English
- Spanish

# John A. Moe, II

## Partner



Partner

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## Overview

John Moe has practiced as an attorney in the areas of Commercial Litigation, Creditor Rights and Bankruptcy/Insolvency in the United States District Courts, the United States Bankruptcy Courts and the California State Superior Courts.

Among other cases, John was the lead litigation attorney, responsible for resolving 14,000 claims in one of the largest Chapter 11 Bankruptcy cases ever filed (Apex Oil Company and its 53 administratively consolidated related entities), Creditors Committee Counsel in the largest telecommunications case (Pacific Gateway Exchange and its 4 related entities), counsel for creditors in the largest financial institution bankruptcy case (Washington Mutual) and debtor's counsel successfully reorganizing a nationwide distributor of siding and roofing materials (MaxiTile, Inc.).

John has represented Plaintiffs and Defendants, Secured Creditors and Unsecured Creditors, Debtors, Trustees and Receivers, Creditor Committees and Creditors. He is a veteran, having served as a Judge Advocate in the United States Air Force.

## Experience

### Litigation in Chapter 11 Proceeding

- Represented 54 debtors in procedurally consolidated Chapter 11 cases, assisting in the drafting, and presentation at trial, of a proposed Plan of Reorganization. Following confirmation of the Plan Of Reorganization, responsible for supervising the review, categorization, litigation and resolution of 14,000 Claims reducing the amount claimed from \$7 billion to \$170 million, including federal and multiple state tax, environmental, admiralty, asbestosis, trade, workman's compensation, personal injury and governmental claims. In the context of the resolution of Claims, defended Reorganized Debtor in connection with the largest oil spill case, to ever occur off the coast of Alaska, prior to the Exxon Valdez oil spill. In the course of the resolution of Claims, filed in excess of 7,000 Objections To Claims and oversaw the preparation, filing and resolution of in excess of 900 Motions setting reserves on Claims in accordance with the confirmed Plan of Reorganization

- Filed Chapter 11 Proceeding for roofing and siding distributor, obtaining after two years, the confirmation of a complex Plan Of Reorganization, pursuant to which pending and threatened litigation in more than 20 states was consolidated, requiring all plaintiffs on all claims for defective products and personal injuries to utilize a Claims Administration Procedure, eliminating federal and state court litigation, and limiting the Reorganized Debtor's exposure on previously filed and to be filed claims for defective product

## Representation of Trustee in Chapter 11 Proceeding

- With Luce Forward's San Francisco Office, represented Chapter 11 Trustee (subsequently, Liquidating Trustee) in the case of a company that specialized in above-market loans to military service personnel, selling overpriced computers and other electronic devices, at high interested rates. On behalf of the Chapter 11 Trustee, opposed multiple, successive Plans Of Reorganization proposed by the Debtor, and, ultimately, negotiated and drafted with the Creditors Committee and Debtor a Joint Plan Of Reorganization, which Plan was confirmed by the Bankruptcy Court.

## Representation of Secured Creditors

- Represented FDIC in state court seeking the appointment of a Receiver, then after Debtor filed Chapter 11, represented FDIC and successor Bank opposing a Plan Of Reorganization, ultimately negotiating—over a course of 11 months—an agreement, pursuant to which homes and hundreds of lots were sold, for the benefit of the Bank
- Represented Bank, in two state court proceedings, and in two bankruptcy cases filed by a physician and his corporation, obtaining appointment of Receivers, then Trustees, in both cases, ultimately obtaining full recovery on loans Bank made to physician and his professional corporation

## Representation of Unsecured Creditors

- Represented 11 former senior executives (former Chief Executive Officers, Presidents, Chief Financial Officers) of H. F. Ahmanson & Company and Home Savings of America, on obligations due senior executives, in the Washington Mutual Bankruptcy Case, filed in Delaware, filing and litigating Claims, ultimately recovering full amount due each Claimant on their respective Claims
- Represented former equity and non-equity partners, of national Law Firm, in connection with the Firm's Chapter 7 bankruptcy case, defending allegations asserted by Trustee against partners, seeking to collect 3 years of compensation and future fees, defending and ultimately resolving complaints asserted by Trustee against partners

## Representation of Receivers in State Court

- Following the filing of a bankruptcy proceeding by principle of developer of housing projects throughout the state of California, represented consortium of Banks, in obtaining the appointment of Receiver in Imperial County, then worked with Receiver to complete construction of homes, then sale of homes, recovering obligation due Banks on construction financing loan. Chinatrust Bank (USA)
- Obtained the appointment of Receiver for a housing development in Menifee, California, then, working with Receiver, protected and restored properties, and completed construction of homes, permitting sale of homes, for the recovery of funds to Bank
- Represented Receiver and Superior Court Commissioner, in connection with class action lawsuit, resolving issues against lawyer who originated the class action, first in the Superior Court, and, then, when originating lawyer filed bankruptcy, in Bankruptcy Court, then—after two years of litigation—the distribution of assets from the class action to both the attorneys who represented class action members and their constituents.
- Sought and obtained the appointment of Receiver, then worked with Receiver on managing multi-location

## Representation of Creditors Committees

- Represented Creditors Committee in international telecommunications failure of five substantively consolidated debtors, successfully working with Debtors' counsel and obtaining confirmation of Liquidating Plan Of Reorganization
- Represented Creditors Committee in nationwide case of television and audio-visual manufacturer, working with Debtors' counsel successfully confirming Chapter 11 Plan Of Reorganization

## Representation of Lessors

- Representation of bank in connection with bankruptcy of seven telecommunications companies, leasing space from Bank in largest telecommunications center in Downtown Los Angeles, filing and litigating Claims in bankruptcy proceedings in Los Angeles, New York and Delaware, obtaining payment of pre-petition and post-petition obligations, and negotiating new post-petition leases on behalf of Bank.
- Representation of Bank in connection with initial, then second bankruptcy of nationwide video company distributor, negotiating resolution of leases and effectuating recovery of leasehold space in locations in California.

## Representation of Creditors

- Representation of developer in multi-state litigation, in simultaneous bankruptcy proceedings, related to acquisition of real property for development of between 150 and 190 homes.

## Representation of Purchasers

- Represented buyer in Bankruptcy Court proceeding on purchase of assets of Mexican food manufacturer.
- Represented "Stocking Horse" bidder in Bankruptcy Court on acquisition of multi-million dollar building in the South Bay.

## Assignment for the Benefit of Creditors

- Represented Assignee for the benefit of creditors, defending assignee, in multiple lawsuits, where Assignee was accused of misrepresentations and malfeasance in carrying out the assignment for the benefit of creditors, dealing with sale of a restaurant chain. Working with insurance defense counsel, filed Complaint against all creditors, obtaining Judgments preventing further recovery by secured and unsecured creditors, and confirmed previous distribution of assets to creditors

## Appointment as Trustee

- Appointed as Trustee, for multi-million dollar trust, effectuating sale of multiple apartment buildings and additional real property, then effectuating distribution of assets to beneficiaries of the trust

## Representation of Estate Trustee

- Representation of financial institution operating as trustee for multi-million dollar estate, effectuating sale of deceased's substantial investments in stock, then sale of real property, working with trustee to distribute assets to beneficiaries of trust

## Military Service

- John served in the United States Air Force, holding the rank of Captain, Office of the Staff Judge Advocate,

- Criminal Defense Counsel, Edwards Air Force Base, California, 1976-1977
- Assistant Staff Judge Advocate and Prosecution Counsel, Kunsan Air Force Base, Korea, 1977-1978;
- Norton Air Force Base, 1978-1980
- Specially Appointed Defense Counsel, Edwards Air Force Base, 1979
- Awarded Meritorious Service Medal, 1979
- John prepared and defended over 150 summary criminal proceedings and multiple jury trials as Base Defense Counsel. He drafted charges for over 100 summary criminal proceedings and prosecuted multiple jury trials as Prosecution Counsel. He interpreted treaties and acted as liaison between judicial officials for the United States Air Force and South Korea. John represented the United States Air Force before the South Coast Air Quality Management District.

## Recognition

- Recognized by *Best Lawyers in America* (2016-2020), the leading peer-review-based directory of legal practitioners, for Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law.
- Martindale-Hubbell® AV Rating
- *Super Lawyers: Corporate Counsel* - Most Recent Listing: 2010 (Bankruptcy & Creditor/Debtor Rights)
- *Super Lawyers: Business Edition* - Most Recent Listing: 2015 (Bankruptcy & Creditor/Debtor Rights)
- *Southern California Super Lawyers* - Most Recent Listing: 2015 (Bankruptcy & Creditor/Debtor Rights, Business Litigation)

## In the Media

- "Verity Collects Approval to Sell Remaining Hospitals," *The Deal*, April 18, 2019
- "Verity to Seek Sale of Hospitals in Chapter 11," *The Deal*, September 1, 2018
- "Judge clears Gardens Regional sale," *The Deal*, August 01, 2016

## Activities and Affiliations

### Community Involvement and Pro Bono

- Notre Dame Club of Los Angeles - Board of Directors (1984-2016), President (1988-1990), Secretary (1986-1988; 2000-2002), Co-Chairman: "The Game Is On" Biennial Luncheon (1988-2016)
- Boy Scouts Of America - Troop 507 Scoutmaster (2011-2016), Assistant Scoutmaster (2004-2010)
- Carolwood Pacific Historical Society Member (1999-2016)
- La Canada Baseball and Softball Association - Member, Board of Directors (2000-2008), President (2006-2008), Secretary (2002-2005)
- St. Francis High School Athletic Booster Club (2007-2010) - President (2008-2009)
- St. Bede Parish Council (2007-2010)
- *Airport Marina Counseling Service* - Member, Board of Directors (1983-2000), Vice-President (1990-1991)

# Areas of focus

## Practices

- Litigation and Dispute Resolution
- Commercial Litigation
- Creditor and Equity Committee Representation

## Education

- University of Notre Dame Law School, 1975, JD
- University of Notre Dame, 1972, BA, *magna cum laude*

## Admissions and qualifications

- California
- Supreme Court of the United States
- US Court of Appeals for the Ninth Circuit
- US Court of Appeals for the Seventh Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California



# Nick Petts

## Managing Associate



Managing Associate

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## Overview

Nick is a member of Dentons' Litigation and Dispute Resolution group in the Washington office. His practice focuses on commercial litigation and arbitration across a range of industries, including energy, financial services, real estate, and government contracting. Nick has substantial experience litigating scores of motions, managing complex document discovery, and assisting with depositions.

## Activities and Affiliations

### Prior and Present Employment

### Clerkships

- Hon. Alia Moses, United States District Court Judge, Western District of Texas

## Areas of focus

### Practices

- Litigation and Dispute Resolution
- Commercial Litigation
- Arbitration

### Industry sectors

- Energy

## Education

- Columbia Law School, 2013, JD, Harlan Fiske Stone Scholar, Columbia Business Law Review
- University of Pennsylvania, 2008, BA, *magna cum laude*

## Admissions and qualifications

- District of Columbia
- Nevada
- New York

# Jae K. Park

## Partner



Partner

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## Overview

Jae Park is a litigator focusing on construction litigation and complex commercial litigation.

Mr. Park represents public and private developers, general contractors and subcontractors on a wide variety of construction disputes. He has particular experience related to public infrastructure projects and government contract procurement issues, including bid protests and the application to construction projects of the US False Claims Act and the California False Claims Act. He also represents owners and contractors in payment and performance bond claims, delay and disruption claims, prompt payment issues, bid protests, stop notice and mechanic's lien claims and claims regarding latent and patent defects in construction and design.

Mr. Park also represents businesses and individuals in commercial disputes involving commercial torts, breach of contract, real estate transactions, misappropriation of trade secrets, fraud, unfair competition and employment disputes. His clients include businesses in the construction, energy, telecommunications, chemical, defense, manufacturing and financial services industries.

In addition, Mr. Park provides pro bono legal services to victims of human rights abuses across the globe, representing refugees fleeing political and religious persecution. In recognition of his exemplary service, he received Casa Cornelia Law Center's Attorney of the Year award in 2016 and the National Asian Pacific American Bar Association's Attorney of the Year award in 2017.

## Experience

- **Public agency:** Represented in a multimillion-dollar dispute arising out of a dam construction project, prosecuting the agency's claims of procurement fraud and submission of false claims.
- **General contractor:** Served as lead trial counsel in a breach of contract and violation of prompt payment claim filed by a subcontractor, arising out of a California Department of Transportation highway renovation/improvement project.
- **Accounting firm:** Served as lead trial counsel in the client's claims of breach of duty of loyalty, unfair competition and misappropriation of trade secrets, made against former employees and a competitor.
- **National bank:** Represented the bank and an employee against allegations of fraud and unfair competition.

- **General contractor:** Represented against claims of defective work in a high school campus renovation and improvement project. Achieved a favorable settlement after obtaining summary adjudication that confirmed subcontractors are obligated to fully defend and indemnify a client against the plaintiffs' claims.
- **Public agency:** Represented in a multimillion-dollar breach of contract, California False Claims Act and negligence case against several multinational construction and engineering companies, arising out of the construction of a hydroelectric power plant. Achieved a favorable settlement for the client.
- **Large HVAC/plumbing contractor:** Defended against allegations of patent infringement and unfair competition made by a competitor regarding cured-in-place-pipe rehabilitation pipe-lining technology. Achieved a favorable settlement and the dismissal by the plaintiff of all claims without compensation.
- **Large HVAC/plumbing contractor:** Successfully defended in a consolidated, multi-party toxic exposure "fear of cancer" case arising out of a project to remodel laboratory space. Negotiated a favorable settlement following expert depositions and the obtaining of issue and evidentiary sanctions against the plaintiffs.
- **National commercial bank:** Represented in a breach of contract claim by another lender on joint loan to commercial developer. Obtained a favorable settlement for the client.
- **International chemical company:** Represented in a case alleging failure to pay utility charges, and a related public corruption investigation. Obtained a favorable settlement for the client and avoided criminal charges.
- **National wireless telecommunications provider:** Successfully defended against a half-billion-dollar breach of contract and antitrust claim by a vendor. Obtained summary judgment in favor of the client on the grounds that the vendor procured contracts by fraud. The judgment was upheld on appeal.
- **National aerospace and defense contractor:** Defended against a claim of disability discrimination made by a former employee. Obtained a favorable settlement for the client.

## Recognition

- Attorney of the Year, National Asian Pacific American Bar Association, 2017
- Attorney of the Year, Casa Cornelia Law Center, 2016

## Insights

- "Electronic Communications and the Attorney-Client Privilege: Are Your Employees Unwittingly Waiving the Privilege by Using Company Email?," *Privacy & Data Security Law Journal*, April 2008

## Activities and Affiliations

### Community Involvement and Pro Bono

- Board member, Korean American Community Center of San Diego
- Board member, Total Youth Productions
- Volunteer attorney, Casa Cornelia Law Center

### Presentations

- Presenter, "The Federal False Claims Act on Construction Projects," Association of General Contractors

- Presenter, "The California and Federal False Claims Act," Construction Managers Association of America, San Diego Chapter, November 6, 2014
- Presenter, "Mechanic's Lien and Stop Notice Laws," Association of General Contractors San Diego, November 13, 2013
- Co-presenter, "Mechanic's Lien and Stop Notice Law – Overview," Association of General Contractors San Diego, July 11, 2013
- Co-presenter, "Mechanic's Lien and Stop Notice Law – Comprehensive Changes in the Law Effective July 1, 2012," CAME San Diego, June 20, 2012
- Panelist, "Lateral Moves: Thinking Beyond Your First Legal Job," University of San Diego School of Law, October 8, 2008
- Speaker, "Making the Most of Your Legal Education," CLEO Program 2008, June 20, 2008
- Session leader, "Unique Challenges Facing Korean American Attorneys," KASSON 21, University of California, San Diego, March 21, 2007

## Memberships

- American Bar Association
- Association of Business Trial Lawyers (Board of Governors)
- Association of General Contractors, San Diego Chapter
- Construction Managers Association of America, San Diego Chapter
- Korean American Bar Association - San Diego (co-founder and director)
- National Asian Pacific American Bar Association
- Pan Asian Lawyers of San Diego (past president)
- San Diego County Bar Association

## Areas of focus

### Practices

- Litigation and Dispute Resolution
- Competition and Antitrust Litigation
- Commercial Litigation
- Employment Disputes
- International Commercial Arbitration
- Trade Secrets Litigation
- Government Contracts - US
- Bid Protests
- Procurement Fraud Investigations and Defense

## Industry sectors

- Defense and Space
- Construction
- Financial Institutions

## Region

- 

## Education

- University of San Diego School of Law, 2004, JD
- University of California at Los Angeles, 1997, BA

## Admissions and qualifications

- California
- US District Court for the Southern District of California

## Languages

- Korean

# Jules Zeman

## Partner



Partner

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## Overview

Jules Zeman is a Partner in the firm's Los Angeles office. His practice concentrates on product liability and complex tort and business litigation, including cases arising from allegations of accountants and lawyer malpractice. He is a certified specialist in appellate law by the State Bar of California Board of Legal Specialization, has handled and/or supervised more than 250 matters in the Court of Appeals, and regularly assists trial teams and outside law firms with pre-trial and trial strategy, important law and motion activity, post-trial motions, and many other activities preliminary to an appeal.

In recent years, he has handled matters for companies and organizations that include American International Group (AIG), Citibank West, City of Los Angeles, The Riverstone Group, Specialty Claims Management, City of Chino, Orange County Fire Authority, FSB, JPMorgan Chase, Wells Fargo, Bank of America, CAMICO Mutual Insurance Company, Terex Corporation, Exxon Mobil, Pep Boys, CertainTeed Corporation, Bombardier Recreational Products, Purolator Filtration Products, Liberty Mutual Group, Maxim Crane, Air Products & Chemical, Macerich, Coleman Company, Flowserve US, Edward Valve, Peoplesoft, Hyundai Motor America, Searles Valley Minerals, Grubb-Ellis, Jon Douglas Company, Procter & Gamble Company, Hartford Specialty Company, INA-PRO, 21st Century Insurance, HDI-Gerling America Insurance, Cannondale Bicycle, Glaxo Welcome (now GlaxoSmithKline), Aetna Insurance, General Security Indemnity Company, DHL Express (USA), Fireman's Fund Insurance, Golden Eagle Insurance, Big Lots Stores, AB Ludwig Svensson and Broan-Nutone.

## Experience

### Notable Engagements

- *Poole v. Orange County Fire Authority(OCFA)* (2015) 61 Cal.4th. 1378. Successfully represented OCFA before the California Supreme Court in reversing a decision that incorrectly interpreted applicable law to require it (and other public agencies) to provide public employees with all written negative comments about them, even if reflective merely of private observations in informal notes that were not available to others and could not have impacted the employee's future employment status.
- *Hagberg v. California Federal Bank, FSB* (2004) 32 Cal. 4th 350. Successfully represented California Federal

- *Cortez v. Purolator* (2000) 23 Cal.4th 163. Represented Purolator Filtration Systems with partial success before the California Supreme Court in a case which applied the Unfair Competition Law, Business & Professions Code §17200 to a violation of the Labor Code regarding overtime wages for purposes of liability under Business & Professions Code Sections 17200 and 17500.
- *Lavie v. Procter & Gamble Co.* (2003) 105 Cal. App. 4th 496. Obtained affirmance of defense verdict for Procter & Gamble, Hoffmann-La Roche and other defendants in a case holding that the reasonable consumer standard is to be applied in the determination of whether advertisements are likely to mislead the public for purposes of liability under California Business & Professions Code, sections 17200 and 17500.
- *Wells Fargo Bank v. Baker* (2012) 204 Cal. App. 4th 1063. Obtained a reversal of an erroneous superior court order that had vacated a judgment in favor of Wells Fargo Bank. The Iowa statute upon which the trial court relied, as applied to national banks, was shown to be preempted by the National Bank Act.
- *Searles Valley Mineral Operation, Inc. v. Ralph M. Parsons Service Co.* (2011) 191 Cal. App. 4th 1394. On behalf of global mineral company, obtained reversal of trial court's order dismissing its action to recover attorneys' fees payments it made on behalf of Kerr-McGee after indemnitor wrongfully refused.
- *Sexton v. Chino Hills Fire Protection District*, 7 Fed.Appx. 610, U.S. App. LEXIS 5354 (9th Cir 2001). Represented Fire Authority before the Ninth Circuit Court of Appeals and obtained affirmance of summary judgment, thereby dismissing claims for violations of 42 U.S.C. § 1983, 43 U.S.C. § 1885(2), including violations of substantive and procedural due process rights, malicious prosecution and abuse of process. This was the last in a series of cases arising out of a government employee's claim that his lack of promotion to Fire Captain was based upon retaliation and other wrongful motives.
- *Clarendon America Insurance Company v. General Security Indemnity Company of America* (2011) 193 Cal. App. 4th 1311. Obtained affirmance of summary judgment upholding the plain meaning of an insurance company's "products-completed operations hazard coverage" provision and "faulty workmanship" exclusion.
- *Golden Eagle Ins. Corp. vs. Cen-Fed, Ltd.* (2007) 148 Cal. App. 4th 976. On behalf of insurer, obtained reversal of adverse judgment and instead compelled enforcement of its "Supplementary Payments Provision."

## Other Notable Appellate Decisions

- *Mettias v. Pep Boys Manny Moe & Jack of California* (2019) 2019 WL 2098403
- *Cardoza v. Gonsalves* (2019) 2019 WL 1771508
- *Johnson v. ArvinMeritor* (2017) 9 Cal.App.5th 234.
- *Lone Star Security and Video, Inc. v. City of Rancho Cucamonga*, 827F.3d1192 (9th Cir. 2016)
- *Shoen v. Zacarias* (2015) 237 Cal. App. 4th 16
- *Chaudhry v. City of Los Angeles*, 751 F. 3d 1096 (9th Cir. 2014).
- *Julius Castle Restaurant v. James Payne* (2013) 216 Cal. App. 4th 1423.
- *Dow Chemical Canada, ULC v. Superior Court* (2011) 202 Cal. App. 4th 170.
- *Steffel Levitt & Weiss v. Astor Holdings*, 278 Fed. Appx. 718, 2008 U.S. App. LEXIS 165209 (9th Cir. 2007).
- *Tang v. City of Westminster*, 92 Fed. Appx. 424, 2004 U.S. App. LEXIS 1100 (9th Cir. 2003).
- *Mora v. Hollywood Bed and Spring* (2008) 164 Cal. App. 4th 1061.
- *Schwab v. So. Cal. Gas Co.* (2004) 114 Cal. App. 4th 1308.



- *Roullet v. Cannondale* (2002) 101 Cal. App. 4th 1180.
- *Truck Ins. Exch. v. Bennett* (1997) 53 Cal. App. 4th 75.
- *Tushinsky v. Arnold* (1987) 195 Cal. App. 3d 666.

## Insights

- "Lead Paint As A Public Nuisance In California," *Law360*, December 6, 2017
- Co-author, "Sargon Update: Reforming the CA Standard for Expert Testimony," *Law Journal Newsletters: Product Liability Law & Strategy*, July 2015
- "The United States Supreme Court Declines to Clarify Rules Governing States' Exercise of Personal Jurisdiction Over Foreign Manufacturers", *Los Angeles Daily Journal*, October 12, 2012
- "Asbestos Case Lends to Application of Political Question Doctrine", *Los Angeles Daily Journal*, February 8, 2012
- "Jurisdiction Over Foreign Manufacturers Remains Uncertain", *Los Angeles Daily Journal*, July 7, 2011
- "A Look at Oral Argument in Battle Over Jurisdiction Between Foreign Manufacturers", *Los Angeles Daily Journal*, January 24, 2011
- "Supreme Court Case Could Significantly Affect Foreign Manufacture", *Los Angeles Daily Journal*, January 11, 2011
- "The Pass-On Defense to Antitrust Violations: Not all Gone", *San Francisco Daily Journal*, July 23, 2010
- "Manufacturers of Non-Defective Products Still Not Liable for Those of Others", *Los Angeles Daily Journal*, May 11, 2010
- "Oklahoma Law Applied to Asbestos Claim", *Los Angeles Daily Journal*, March 4, 2010

## Areas of focus

### Practices

- Litigation and Dispute Resolution
- Product Liability and Complex Torts
- Professional Liability Litigation
- Appellate Advocacy

## Education

- Temple University, 1982, LL.M., Tax
- Temple University, 1980, JD
- Temple University, 1977, BBA, in Accounting/Finance

## Admissions and qualifications

- California
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California
- US Supreme Court

# Erin N. Bass

## Senior Managing Associate



Senior Managing Associate

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## Overview

Erin Bass is a Senior Managing Associate in Dentons' Litigation and Dispute Resolution practice with first-chair jury trial experience. She focuses her practice on labor and employment litigation and complex commercial litigation.

Erin has successfully defended employers against wage-hour class actions, and individual claims of discrimination, wrongful termination, and whistleblower retaliation.

Erin also counsels employers on risk management and litigation avoidance. She has developed and implemented training programs for management on best practices and compliance, and has designed policies and procedures to guide supervisors and HR professionals on lawfully and efficiently managing their workforce.

Erin also represents Fortune 500 corporations and government entities in complex disputes involving allegations of fraud, breach of fiduciary duty, extortion, antitrust, breach of contract, and insurance bad faith.

Erin's trial experience includes first-chairing a federal jury trial on behalf of a pro bono client, where she secured a unanimous verdict in her client's favor on his First Amendment and Due Process claims.

## Experience

### Employment Litigation and Counseling

- Defended various clients against discrimination, retaliation, and wrongful discharge claims under Title VII, California's Fair Employment and Housing Act, the Age Discrimination in Employment Act, the Family Medical Leave Act, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, and Arizona's Employment Protection Act.
- Guided employers through restructures, relocations and mass layoffs, including their obligations under the Worker Adjustment and Retraining Notification (WARN) Act and states' mini-WARN laws.
- Achieved dismissal with prejudice of state wage-hour claims based on Labor Management Relations Act preemption argument.
- Advised employers on compliance with their obligations related to COVID-19, including paid leave

- Represented employers seeking to protect trade secrets and proprietary information from departing employees or to enforce non-competition and non-solicitation clauses in employment contracts.
- Defended a company in a multi-state wage-and-hour class action in a New York federal court challenging the employer's tip credit and uniform allowance pay policies under the Fair Labor Standards Act and various state laws.
- Defended an employer against a wage-and-hour class action in a California federal court challenging the company's piece-rate pay system under the Fair Labor Standards Act and California law, and alleging a joint employer relationship.
- Represented clients in connection with US Department of Labor wage-and-hour audits.

## Labor

- Second-chair trial counsel in *Walmart Stores Inc.*, 368 NLRB No. 146 (Dec 16, 2019), where the NLRB ruled that the employer did not violate the NLRA by restricting union insignia to "small and non-distracting" size on the sales floors of 5,000+ nationwide stores.
- Trial counsel in *Walmart Stores, Inc.*, 368 NLRB No. 24 (July 25, 2019), where the NLRB held that the employer did not violate the NLRA because employees engaged in unprotected intermittent work stoppages.
- Represented an employer in a consolidated unfair labor practice trial, and appeal to the NLRB, challenging its discipline of employees who conducted a demonstration on a retail sales floor.
- Appeared for employers in dozens of other unfair labor practice proceedings, including challenges to decisions to close a facility and allegations of nationwide retaliation.
- Appeared for employers in NLRB representation hearings involving challenges to unions' petitioned-for unit of employees and objections to election proceedings under the expedited election rules.
- Advised employers on union-organizing campaigns in retail stores, distribution centers, food processing plants and among truck drivers.
- Represented employers in grievance arbitrations alleging discharge without just cause.

## Commercial Litigation

- Represented a tribe in federal court in a case alleging fraud, misrepresentation and breach of contract, and involving issues of preemption and inter-governmental immunity.
- Represented a hospital as plaintiff in a case against a medical provider alleging breach of contract and bad faith.
- Won a jury verdict for a defendant insurance company in a case alleging breach of contract and bad faith denial of coverage, where the plaintiffs sought more than \$1 million in damages.
- Won a partial summary judgment on bad faith claims for a defendant insurer.

## Recognition

- *Southwest Super Lawyers*, 2018-2020, "Rising Star" in employment and labor law

## In the Media

- Cited by *Corporate Counsel*, February 2018

- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 209 of 1318
- Quoted in an article on "Paid Sick Leave Under Prop. 206," *The Arizona Republic*, July 14, 2017
  - Quoted in an article on "Arizona's New Sick-Leave Law," *The Arizona Republic*, June 29, 2017

## Insights

- Co-author, "Mid-Sized Business Loan Program Carries Significant Labor Law Implications," Dentons client alert, April 7, 2020
- Co-author, "COVID-19: Furloughs, layoffs, and hours reductions under the federal WARN Act (United States)," Dentons client alert, March 23, 2020
- Co-author, "Department of Labor issues final rule clarifying how to calculate the 'regular rate' for overtime pay," Dentons client alert, December 16, 2019
- Author, "Practical guidance for employers on confidentiality provisions that survive NLRB scrutiny," *ABA Journal of Labor & Employment Law*, Volume 34, Number 1, October 10, 2019
- Co-author, "Balancing privilege interests with employees' US labor rights in internal investigations," ACC Docket, September 19, 2019
- Co-author, "The Hidden Landmine in Arizona's Earned Paid Sick Time Law," *AZ Business Magazine*, June 15, 2017

## Activities and Affiliations

### Presentations

- Speaker, "Arizona's Paid Sick Time Law: Are You in Compliance?," Southwest Arizona Human Resources Association (SAHRA) and RevAZ Workshop, November 14, 2018
- Speaker, "How to Draft an Employee Handbook According to the NLRB," 12th Annual ABA Section of Labor and Employment Law Conference, November 9, 2018
- Speaker, "Arizona's Paid Sick Time Law. Are you in Compliance?," Arizona Commerce Authority, RevAZ 2018 Workshop Series, September 13, 2018
- Speaker, "15th Annual Labor Relations Conference," May 3, 2018
- Speaker, "I'm Still Hoping for the Raise...Denying a Wage Increase During Bargaining: A Look at Arc Bridges Inc. v. NLRB" ABA Committee on the Development of the Law Under the NLRA 2018 Midwinter Meeting, February 26, 2018

### Memberships

- Contributing Editor, *The Developing Labor Law*
- Pro Bono Committee Co-Chair, ABA Committee on the Development of the Law Under the NLRA
- Member, National Financial Institutions Employment Lawyers Committee
- Secretary, Arizona Law Review Alumni Association

## Prior and Present Employment

### Clerkships

## Areas of focus

### Practices

- Commercial Litigation
- Employment and Labor
- Restrictive Covenant Disputes
- Restructuring, Redundancies and Reductions in Force
- Wage and Hour/Working Time/Overtime Litigation
- Native American Law and Policy (United States)

### Industry sectors

- Retail
- Construction
- Financial Institutions
- Manufacturing
- Freight and Logistics

## Education

- University of Arizona College of Law, 2012, JD, *summa cum laude*; Order of the Coif; Research Editor, *Arizona Law Review*
- Arizona State University, 2009, BA, (journalism), *cum laude*

## Admissions and qualifications

- Arizona
- California
- US Court of Appeals for the Fifth Circuit
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the District of Arizona

# Michael A. Isaacs

## Partner



Partner

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San Diego

Michael.Isaacs@dentons.com

## Overview

Michael has more than 35 years of experience in the representation of Chapter 7 and 11 trustees, state and federal court receivers, assignees, examiners, buyers and creditors' committees, in a broad range of bankruptcy, insolvency and workout situations.

## Experience

Recent representations include the following:

- Chapter 7 trustee in the case of In re BioCeryx, Inc., Case No. 19-30631 DM, in the successful sale in place of the operating assets of a biotech company that was commercializing technology that demonstrated sample processing and obviated the need for capital and labor-intensive lab work related to high-risk pregnancies. The debtor was commercializing a fully-integrated DNA analysis platform originally developed under a \$25 million United States government grant.
- Chapter 7 trustee in the case of In re Diadexus Inc., Case No. 16-30654 HLB, a diagnostics company dedicated to commercializing products to help healthcare providers in management of patients with cardiac disease. All of the operating assets of the company were successfully sold.
- Liquidating agent under a confirmed plan of reorganization in her capacity first as an examiner with expanded powers and then as liquidating agent under a confirmed plan, where she was tasked with evaluating and liquidating approximately 30 improved parcels of real property located in Northern California.
- Receiver appointed by the United States District Court, Northern District of California, to sell an improved parcel of commercial real property located in San Francisco to assist in the collection of a judgment of over \$7 million.

## Recognition

- *Martindale-Hubbell*® AV Preeminent Rating

- Case 2:18-bk-20151-ER Doc 6218 Filed 11/03/20 Entered 11/03/20 17:33:45 Desc  
Main Document Page 212 of 1318
- *Best Lawyers in America* - First Year Listed: 1995 - Most Recent Listing: 2020 (Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law and Litigation – Bankruptcy)
  - *Super Lawyers: Corporate Counsel* - Most Recent Listing: 2010 (Bankruptcy & Creditor/Debtor Rights)
  - *Super Lawyers: Business Edition* - 2015 and 2011 (Bankruptcy & Creditor/Debtor Rights)
  - *Northern California Super Lawyers* - Most Recent Listing: 2017 (Bankruptcy: Business & Creditor/Debtor Rights: Business)

## Activities and Affiliations

### Memberships

- California Receiver's Forum
- Past President: Bay Area Bankruptcy Forum, one of the forums that comprise, collectively, the California Bankruptcy Forum
- Board of Directors of the Bay Area Bankruptcy Forum
- American Bankruptcy Institute
- Resolution Advocate: United States Bankruptcy Court, Bankruptcy Dispute Resolution Program
- Standing Committee on Professional Conduct, appointed by the United States District Court for the Northern District of California - 1999-2006
- Bar Association of San Francisco
- American Bar Association
- Debtor/Creditor Relations and Bankruptcy Committee of the Business Law Section of the State Bar of California - 1992-1995
- National Association of Bankruptcy Trustee
- Santa Clara County Bar Association

## Areas of focus

### Practices

- Insolvency Administrators, Monitors, Receivers, Trustees and Other Officeholders
- Litigation and Dispute Resolution
- Real Estate
- Restructuring, Insolvency and Bankruptcy
- Creditor and Equity Committee Representation

## Education

- Santa Clara University School of Law, 1981, JD
- University of California at Berkeley, 1968, AB



# Admissions and qualifications

- California
- Supreme Court of the United States
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

# Jacqueline Whipple

## Senior Managing Associate



Senior Managing Associate

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## Overview

Jacqueline Whipple is a member of Dentons' Litigation and Dispute Resolution and White Collar and Government Investigations practices. Her experience includes counseling clients on government investigations and litigation, conducting internal investigations of both domestic and multinational organizations and assisting in the defense of complex litigation and enforcement actions by government agencies, with a particular focus on actions involving the US Foreign Corrupt Practices Act (FCPA) and antitrust fraud.

Jacqueline also handles a wide range of litigation and appellate work, including breach of contract, insurance, environmental tort, trade secrets, employment, class action, condemnation and construction disputes. She has litigated disputes in federal courts, state courts and in arbitration.

Jacqueline handles all aspects of pretrial litigation, including dispute resolution strategy, e-discovery efforts, depositions, arguing motions and drafting dispositive and other motions. Jacqueline has second-chair experience with jury trials, and first-chair experience with appellate practice. She also has experience with the energy industry, including proceedings before regulatory and legislative bodies.

## Experience

- **Multinational health care company:** Assisted in forming a defensive strategy, and conducting internal investigations in multiple jurisdictions for compliance with the US FCPA.
- **Closely held professional corporation:** Defending against an American Arbitration Association (AAA) claim brought by a departing member of a closely held professional corporation, Jacqueline successfully assisted the client in resisting the departing member's dispute regarding severance. As a result of Jacqueline's strategic discovery, persuasive pretrial motions and vigorous presentation of evidence at hearing, the arbitrator entirely rejected the plaintiff's liability and damages theories.
- **International franchise company:** Represented in strategic settlements and arbitrations. Jacqueline assisted in structuring favorable franchise agreement re-negotiations, and in resolving franchisee disputes through mediation and arbitration, in multiple jurisdictions.

# Recognition

## Honors and Awards

- *Super Lawyers* "Missouri & Kansas Rising Star," 2017 and 2018

## Activities and Affiliations

### Community Involvement and Pro Bono

- Board member of Impact KC, a nonprofit that distributes grants to Kansas City-based charities.
- Seventh Circuit Appeal: represented indigent pro bono client; developed innovative appellate arguments and presented oral argument; Seventh Circuit Court of Appeals issued written opinion noting errors in conduct of the trial.
- Secured an appellate victory for a woman and son who were denied a domestic violence protection order by the Circuit Court of Cook County. The Illinois First District Appellate Court agreed that the lower court failed to comply with the Illinois Domestic Violence Act, and reversed and remanded for a plenary hearing in compliance with the statutory requirements.

### Presentations

- Co-presenter, "Contract litigation strategies: When Standard Terms Lead to Substandard Results," Practicing Law Institute, April 10, 2019
- Presenter, "How To Get Your Evidence Admitted (and Keep Theirs Out)," National Business Institute's Seminar on Civil Trial: Everything You Need To Know, Overland Park, Kansas October 25, 2018
- Presenter, "Motions in Limine," National Business Institute's Seminar on Advanced Civil Litigation Skills, Overland Park, Kansas, June 2017

### Memberships

- Federal Bar Association
- Missouri and Kansas Bar Associations, including the Young Lawyers Sections
- Kansas City Metropolitan Bar Association
- Association for Women Lawyers of Greater Kansas City

### Prior and Present Employment

Previously, Jacqueline served as a judicial law clerk for the Hon. Beth Phillips in the US District Court for the Western District of Missouri. She also worked as a summer clerk for the Hon. Nanette K. Laughrey in the US District Court for the Western District of Missouri.

## Areas of focus

### Practices

- Appellate Advocacy

- Employment Disputes
- Energy Litigation
- Environmental Litigation
- Intellectual Property Litigation
- Internal Investigations
- Global Anti-Corruption
- Litigation and Dispute Resolution
- White Collar and Government Investigations

## Industry sectors

- Life Sciences and Health Care
- Manufacturing

## Region

- United States

## Education

- University of Missouri School of Law, 2012, JD
- University of Missouri, 2008, BA, Journalism with Magazine Emphasis, Minor in Spanish

## Admissions and qualifications

- Kansas
- Missouri
- US Court of Appeals for the Eighth Circuit
- US Court of Appeals for the Seventh Circuit
- US District Court for the District of Kansas
- US District Court for the Western District of Missouri

# Ashley B. Huddleston

## Managing Associate



Managing Associate

New York

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## Overview

Ashley is a managing associate in Dentons' Litigation and Dispute Resolution practice working out of the New York office. Ashley represents clients in a wide variety of business matters involving contract disputes, accounting malpractice, and other commercial matters in both state and federal courts. She has experience advocating for clients at all stages of litigation, including discovery, motion practice, and oral arguments.

Ashley also has experience representing clients in regulatory investigations and proceedings brought by the United States Securities and Exchange Commission (SEC). Her practice includes representing companies and individuals in government investigations, counseling clients during regulatory examinations, and providing general compliance advice. Her experience includes drafting responses for SEC examination deficiency letters, responding to enforcement subpoenas and document requests, and preparing and presenting witnesses for testimony.

Prior to joining Dentons, Ashley worked for a global law firm as a member of their litigation practice. While in law school, Ashley served as the Executive Notes and Comments Editor of the Journal of Law and Policy and received the Scholarly Journal Writing Award for her published work. She also served as a Civil Division legal intern for the United States Attorney's Office, E.D.N.Y.; a legal intern in the Litigation Bureau of the New York State Office of the Attorney General; and a judicial intern for the Hon. Joan M. Azrack, Magistrate Judge, U.S. District Court, E.D.N.Y.

## Insights

- Co-author, "Digital transformation in the United States and 'transatlantic' legislation and litigation," "Business Going Digital" online guide, August 2020

## Activities and Affiliations

- New York City Bar Association
- New York Women's Bar Association

# Areas of focus

## Practices

- Litigation and Dispute Resolution
- Commercial Litigation
- Professional Liability Litigation
- Financial Services Litigation
- Financial Markets Litigation and Regulation
- White Collar and Government Investigations

## Education

- Brooklyn Law School, 2015, J.D., *cum laude*
- University of Rochester, 2010, BA

## Admissions and qualifications

- New Jersey
- New York
- US Court of Appeals for the Second Circuit
- US District Court for the District of New Jersey
- US District Court for the Eastern District of New York
- US District Court for the Southern District of New York

## Languages

- English

# Anna Youssefi

## Senior Managing Associate



Senior Managing Associate

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## Overview

Anna is a member of Dentons' Employment & Labor practice. Her practice focuses on counseling clients on labor and employment law matters, including compliance with federal and state employment laws and assisting clients with employee terminations, including layoffs. She also assists clients with the preparation of employment documents, including employee handbooks and internal policies. Anna also prepares affirmative action plans for federal contractors and advises clients on compliance with federal employment regulations relating to affirmative action.

In addition, Anna represents clients in Employee Retirement Income Security Act (ERISA) disability litigation. Anna also works with clients in the life, health and disability insurance industries and represents clients in business disputes involving claims for breach of contract, breach of fiduciary duty, unfair competition, unfair business practices, bad faith, fraud and improper sales practices, among other matters.

## Experience

### Employment & Labor

- Assisted client with layoff, including WARN Act compliance.
- Prepared Affirmative Action Plans for federal government contractor client.
- Represented federal government contractor client in connection with Office of Federal Contract Compliance Programs (OFCCP) compliance audit and reached successful closure of same.
- Assisted in obtaining summary judgment in employment discrimination action with significant exposure.
- Drafted executive release agreements and assisted with negotiation of terms of agreements.
- Advised client on leave policies, including nationwide sick leave policy and maternity and paternity leave policies.

- Defending insurers against claims for breach of contract and breach of the duty of good faith and fair dealing, based on alleged wrongful termination/improper lapse of life insurance policies.
- Obtained a summary judgment in favor of a life insurer in a wrongful rescission and bad faith action.
- Successfully moved to strike class-action allegations in a putative class action involving unfair business practices and bad faith claims.
- Assisted in obtaining an important defense ruling in a nationwide class action involving consumer protection and unfair competition claims.
- Achieved the resolution of complex interpleader action on behalf of an insurer involving disputed life insurance benefits.

## Commercial Litigation

- Defended and successfully negotiated a nationwide settlement of a class action filed against a manufacturer of dietary supplements.
- Represented a multinational company in a putative class action for alleged violations of the Song-Beverly Credit Card Act.
- Defended a breach of contract claim based on a purchase and sale of asset transaction.

## Recognition

### Honors and Awards

- Witkin Award for Academic Excellence – Business Organizations
- Witkin Award for Academic Excellence – California Civil Procedure
- Witkin Award for Academic Excellence – Remedies
- Witkin Award for Academic Excellence – Family Law
- Cali Excellence for the Future Award – Business Organizations
- Cali Excellence for the Future Award – Criminal Procedure

## Insights

- Co-author, “Filling in the Gap - California State and City Supplemental Paid Sick Leave Measures,” Dentons client alert, April 30, 2020

## Areas of focus

### Practices

- Employment and Labor
- Employment and Labor Advice and Counseling
- Employment Contracts, Handbooks and Policies



- ERISA Litigation
- Human Resources Advice and Counseling
- Commercial Litigation
- Class Action Defense

## Industry sectors

- Bad Faith Defense
- Defense and Space
- Insurance
- Insurance Litigation and Arbitration
- Life Insurance and Annuities
- Sales Practices Litigation

## Education

- Santa Clara University School of Law, 2008, JD, *summa cum laude*, Order of the Coif
- University of California at Davis, 2004, BA, with honors

## Admissions and qualifications

- California
- US Court of Appeals for the Fourth Circuit
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

# Monica L. Irel

## Counsel



Counsel

Miami

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## Overview

Monica Irel is a member of Dentons' Litigation and Dispute Resolution practice. Monica focuses her practice on commercial litigation, labor and employment cases, insurance litigation, ADA litigation and products liability suits.

Monica represents numerous corporations, insurance companies and individuals. Her extensive litigation and dispute resolution experience includes negotiation and trial representation in a wide variety of business disputes, including claims of breach of contract, misrepresentation, fraud and business disruption. She also represents insurance companies in coverage disputes, including bad faith actions.

After completing her undergraduate degree at UCLA, Monica obtained a JD from the USC School of Law in Los Angeles, CA, and then began practicing law as a plaintiffs' attorney in a Los Angeles personal injury firm, where she concentrated on personal injury and workers' compensation cases and acquired considerable courtroom experience, before leaving the firm to focus on defense litigation. After stints with two prominent Los Angeles defense firms, Monica relocated to Florida, where she joined a Miami firm that specialized in the defense of aircraft manufacturers, aircraft maintenance facilities, fixed base operators, and aircraft owners and operators, and gained extensive experience, including at trial, handling commercial litigation, product liability claims and wrongful death cases for global companies such as BBA Aviation, Piedmont Hawthorne Aviation/Landmark Aviation, Servisair/GlobeGround, Presidential Airways, Spirit Airlines and Piper Aircraft.

As a pro bono attorney, Monica has been active for many years in Florida's guardian ad litem program.

## Experience

- **Aircraft manufacturer:** Obtained summary judgment in million dollar product liability claim and protected judgment on appeal in the Eleventh Circuit.
- **Transportation company:** Acted as first chair trial counsel in multi-week personal injury trial against transportation company resulting in defense verdict.
- **Large property development company:** Tried personal injury case, obtaining defense verdict.
- **Major hospital:** Defended against government claims of regulatory violations, resulting in retraction of

- **Airport operator:** Obtained summary judgment in wrongful death litigation.
- **Large corporations:** Successfully negotiated a series of ADA lawsuits against large corporations on extremely favorable terms.

## Insights

- Co-author, "Surge of website accessibility lawsuits to continue as SCOTUS declines to review Ninth Circuit decision in *Robles v. Domino's Pizza* ; businesses advised to take preventive measures," Dentons client alert, October 10, 2019

## Activities and Affiliations

### Community Involvement and Pro Bono

- Volunteer, Florida Guardian Ad Litem Program
- Member, Educational Excellence School Advisory Council, Miami-Dade County

### Presentations

- Presenter, "The Future of the Affordable Care Act - Nine Years Later, Can the ACA Survive its Biggest Challenge," Total Rewards Association of South Florida (TRASf), May 14, 2019
- Presenter, "Taking a Strategic Deposition"

## Areas of focus

### Practices

- Litigation and Dispute Resolution
- Transportation Litigation and Dispute Resolution
- Employment and Labor
- Commercial Litigation
- Professional Liability Litigation

### Industry sectors

- Transportation
- Aviation and Aerospace
- Product Liability
- Insurance

## Admissions and qualifications

- California

- Florida
- Supreme Court of California
- Supreme Court of Florida
- US Court of Appeals for the Eleventh Circuit
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Middle District of Florida
- US District Court for the Northern District of Florida
- US District Court for the Southern District of Florida

## Languages

- Spanish

# Nicholas A. Koffroth

## Senior Managing Associate



Senior Managing Associate

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## Overview

Nicholas A. Koffroth is a senior managing associate in Dentons' Restructuring, Insolvency and Bankruptcy group. Nick's practice at Dentons includes bankruptcy matters as well as in- and out-of-court restructuring efforts.

Nick's practice focuses on healthcare industry restructuring efforts. Nick has also represented debtors and creditors in a wide range of industries through all aspects of the Chapter 11 process, including first-day motions, relief from the automatic stay, 363 sales, claims litigation, avoidance actions based on preferential or fraudulent transfers and other adversary proceedings, and plan confirmation. His bankruptcy representations include secured and unsecured creditors, debtors in possession, asset purchasers, creditors' committees and officers and directors.

Nick also has substantial experience representing individuals and companies in all phases of commercial litigation, from document discovery, witness interviews and pre-trial motion practice through trial, post-trial motions and appeal. He has conducted case assessments, counseled clients on the possible consequences of settlement or trial, and mapped litigation strategies that align with the client's business objectives. His experience spans both federal and state courts and includes complex financial services and commercial litigation.

Nick's commercial litigation experience includes representations of commercial mortgage-backed securities (CMBS) trusts and special servicers in matters involving resolution of intercreditor disputes; prosecution of foreclosure and guaranty actions and pursuit of receivership appointments; defending lender-liability actions; and litigating breach of contract and fraud actions relating to loan agreements. Nick has represented CMBS commercial lenders and special servicers in state court foreclosure proceedings and related actions, subsequent bankruptcy filings, and all levels of appeal including before the United States Court of Appeals for the Ninth and Tenth Circuits as well as the United States Supreme Court.

Nick also counsels companies on credit and bankruptcy risk mitigation strategies and drafted provisions in leases, licenses and operating agreements to protect against the occurrence of certain bankruptcy or insolvency events.

Nick maintains an active pro bono practice and has litigated claims for asylum, special immigrant juvenile status, and guardianship before the United States Immigration Court and Los Angeles County Superior Court.

## Experience

- Verity Health System of California, Inc. and 16 related entities, including 6 significant operating hospitals, in the second largest hospital bankruptcy case in American history. Dentons has already secured court approval of the sale of two hospitals for \$235 million, over the objections of various parties, including the California Attorney General.
- A CMBS trust in connection with a petition for certiorari, granted in part by the United States Supreme Court in *U.S. Bank Nat'l Ass'n v. Village at Lakeridge, LLC*, 138 S. Ct. 960, 2018 WL 1143822 (Mar. 5, 2018) and related merits briefing.
- Five CMBS trusts in bankruptcy litigation and appellate matters related to the 76 jointly administered bankruptcy cases of *In re John Q. Hammons Fall 2006, LLC et al.* before the United States Bankruptcy Court for the District of Kansas, the Bankruptcy Appellate Panel for the Tenth Circuit, and the Tenth Circuit Court of Appeals.
- A Prints and Advertising Lender in the Chapter 11 bankruptcy cases filed by Los Angeles-based film production and distribution company Open Road Films, LLC, and certain debtor affiliates, in the United States Bankruptcy Court for the District of Delaware.
- A global watch company as a Chapter 11 debtor, completing a 363 sale of the company's assets less than two months after the commencement of bankruptcy, and obtaining Court approval of the company's Chapter 11 plan in under four months before the United States Bankruptcy Court for the Southern District of New York.
- Numerous actors, producers, directors, and writers as counter-parties to contracts in The Weinstein Company Chapter bankruptcy cases in the United States Bankruptcy Court for the District of Delaware.
- Intellectual property licensors and licensees in bankruptcy cases and Assignment for the Benefit of Creditors proceedings throughout the United States.
- Various CMBS trusts in successfully foreclosing on properties securing securitized commercial loans ranging from millions of dollars to upwards of several billion dollars, including successful petitions for the appointment of a receiver to manage the property at issue while the foreclosure action was pending.

## Recognition

- Recognized as a Rising Star for Bankruptcy in Southern California in *Super Lawyers* magazine (2019-2020)

## In the Media

- "The coronavirus pandemic impact on a hospital bankruptcy," *The Bond Holder*, April 30, 2020
- "Verity Cleared to Sell Two Hospitals," *The Deal*, April 13, 2020

## Insights

- Andrew J. Currie & Nicholas A. Koffroth, *Sino Clean Energy, Inc. v. Seiden (In re Sino Clean Energy, Inc.): Authority to File and the Tension Between Bankruptcy and Receivers*, 4 NORTON BANKR. L. ADVISER NL 2 (Apr. 2019)

## Activities and Affiliations

- Member, Board of Directors, Los Angeles Bankruptcy Forum, 2019-2021 term
- Chair, Bankruptcy Section Executive Committee, Beverly Hills Bar Association (2018-2019)

- Producer, “Small Fish in A Big Tide Pool: Individual and Small Business Chapter 11s,” California Bankruptcy Forum, Santa Barbara CA, May 16, 2020
- Producer, The Small Business Reorganization Act of 2019, Los Angeles Bankruptcy Forum, Los Angeles, CA, April 20, 2020
- Producer, Judges’ Roundtable, California Bankruptcy Forum, Palm Springs, CA, May 18, 2019
- Program Chair, “The Intersection of IP and Bankruptcy Law: Thorny Issues Arising in Entertainment Bankruptcies,” Beverly Hills Bar Association, Los Angeles, CA, April 17, 2019

## Prior and Present Employment

Prior to joining Dentons, Nick was an associate in the Los Angeles office of a national law firm, where he also practiced in the areas of bankruptcy and creditors rights and commercial litigation. After law school and before entering private practice, he served in multiple clerkships in the US Bankruptcy Court for the Central District of California, including as a law clerk to the Hon. Sandra R. Klein, the Hon. Thomas B. Donovan, the Hon. Victoria S. Kaufman, the Hon. Neil W. Bason and the Hon. Sheri A. Bluebond.

## Areas of focus

### Practices

- Restructuring, Insolvency and Bankruptcy
- Debt Capital Markets
- Distressed Assets
- Litigation and Dispute Resolution
- Appellate Advocacy
- Commercial Litigation
- Financial Services Litigation
- Real Estate
- Intellectual Property Litigation
- Real Estate Investment Trusts (REITs)
- Real Estate Litigation and Dispute Resolution
- Business Structures and Tax Planning

### Industry sectors

- Distressed Health Care
- Financial Institutions
- Life Sciences and Health Care
- Media, Entertainment and Sports

## Education

- Loyola Law School, 2012, JD
- University of California, Los Angeles, 2008, BA

## Admissions and qualifications

- California
- District of Columbia
- New York
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California
- US District Court for the Southern District of New York
- US Supreme Court



# Camille Bacon-Schulte

## Managing Associate



Managing Associate

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## Overview

Camille Bacon-Schulte is a member of Dentons' Real Estate practice. Camille represents clients in the business of acquiring, developing, and leasing real estate, whose transactions span the gamut from the acquisition of raw land in Texas with an eye towards future improvement, to the development of first-class mixed-use and multifamily projects in California, to the acquisition of marinas and yacht clubs located across the United States. In addition, Camille also represents clients in the business of financing such projects, including various institutional lenders and joint ventures.

She is experienced in drafting and negotiating purchase and sale agreements, declarations of CC&Rs, easements, licenses, and other agreements ancillary to the acquisition, development, lease-up, and management of mixed-use, multifamily, and niche properties, as well as loan origination, modification, and refinancing documents.

Camille is a member of the Osage Nation.

## Recognition

- Recognized in the 2021 edition of *Best Lawyers* "Ones to Watch"

## Insights

- "Avoid assuming a medical lease upon practice acquisition," *Colorado Real Estate Journal*, July 20, 2018
- "Prohibition on Driveway Delivery of Unsolicited Materials Survives Intermediate Scrutiny of Sixth Circuit," *Rocky Mountain Sign Law Blog*, January 22, 2018
- "Ninth Circuit Rules Against Ventura County Conditional Use Permitting Scheme," *Rocky Mountain Sign Law Blog*, December 15, 2017

## Activities and Affiliations

## Prior and Present Employment

Following law school, Camille joined Latham & Watkins LLP's project finance group in San Diego, California where she primarily represented institutional lenders in the hospitality and gaming sectors. She later joined a real estate boutique in Denver, Colorado before joining Dentons in 2019.

## Areas of focus

### Practices

- Real Estate
- Real Estate Finance
- Project Finance
- Hotel Financing
- Real Estate Leasing Occupation and Operation
- Development Zoning and Planning
- Commercial Development

### Industry sectors

- Gaming
- Construction

## Education

- Cornell Law School, 2014, JD, Articles editor, *Cornell Journal of Law and Public Policy*
- University of Colorado at Boulder, 2010, BA

## Admissions and qualifications

- Alaska
- California
- Colorado
- Texas

# Christopher A. Keyser

## Managing Associate



Managing Associate

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## Overview

Christopher A. Keyser is a member of Dentons' Corporate practice. His practice focuses on advising clients with respect to their private merger, acquisition, divestiture and financing transactions, particularly in the micro and middle markets. Chris has experience ranging from local representation of small businesses to the representation of private equity clients with a global presence.

Chris is part of a team of Dentons lawyers that act as outside general counsel on a wide variety of business matters, including business formation, corporate governance, strategic planning and structuring and day-to-day legal matters, including negotiation of purchase and supply agreements, commercial lease agreements, loan agreements, and employment agreements.

## Activities and Affiliations

- Missouri State Bar Association
- Kansas City Metropolitan Bar Association
- Association for Corporate Growth
- Kansas City Volunteer Lawyers and Accountants for the Arts

## Areas of focus

### Practices

- Business Agreements and Commercial Contracts
- Corporate
- Corporate Governance

## Industry sectors

- Private Equity

## Education

- University of Kansas School of Law, 2015, JD, *Order of the Coif*
- University of Missouri-Kansas City, 2010, BA, Economics

## Admissions and qualifications

- Missouri

# Malka S. Zeefe

## Counsel



Counsel

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## Overview

Malka is a member of Dentons' Restructuring, Insolvency and Bankruptcy practice. Malka's practice focuses on a broad range of large, complex domestic and international business reorganization and restructuring matters. These include the representation of creditors, debtors, committees, governmental and nongovernmental entities and other parties. Malka also has experience representing lenders and borrowers in complex international financing transactions.

In addition to her legal experience, in 2019, Malka co-founded Postpartum Pelvic Health Advocates, a patient advocacy organization championing postpartum pelvic health.

## Experience

### Bankruptcy and Restructuring

- **Verity Health System of California:** Representing parent not-for-profit company and sixteen affiliated entities, including six significant operating hospitals, in the second largest hospital bankruptcy case in American history.
- **Astria Health:** Representing Astria Health System in a recent filing of 13 related chapter 11 cases. Located in Yakima, Washington, the health system includes three operating acute care hospitals.
- **Liquidating trustee of Hovensa LLC:** Representing in Chapter 11 proceedings in the Virgin Islands. When in operation, Hovensa was the largest oil refinery and terminal facility in the Western Hemisphere.
- **Puerto Rico:** Represented the Fiscal Agency and Financial Advisory Authority and the Government Development Bank for the Commonwealth of Puerto Rico regarding its restructuring and revitalization efforts prior to commencement of proceedings under the Puerto Rico Oversight, Management, and Economic Stability Act (PROMESA).
- **Doctors Community Hospital Corporation liquidating trustee:** Represented in the Greater Southeast Community Healthcare Corporation bankruptcy cases, one of the largest restructuring matters ever filed in the District of Columbia, involving five failed hospitals and a management company.

- **Natural Products Group, LLC:** Represented the parent and certain of its subsidiaries, including Arbonne International, LLC, and Levlad, LLC, in a Chapter 11 case in Delaware.
- **Global Power Equipment Group and its domestic subsidiaries:** Represented these leading providers of power generation equipment and specialty maintenance services in a Chapter 11 case in Delaware.
- **Ad hoc committee of Arahova Noteholders:** Represented in one of the largest and most contentious US Chapter 11 cases, that of Adelphia Communications Corporation, administered in the Southern District of New York.
- **Ad hoc group of senior secured noteholders of Solutia, Inc.:** Represented in the contentious Chapter 11 bankruptcy cases for this leading global manufacturer of performance materials and specialty chemicals.
- **Mirant:** Represented one of the world's largest producers, generators and marketers of electricity, along with its affiliates, in one of the largest energy bankruptcy cases filed in the United States.

## Bank Finance

- **Bank syndicate:** Represented a syndicate of 27 national and international banks, led by Deutsche Bank Luxembourg SA as facility agent, on a €1.5 billion refinancing for Evonik Industries AG.
- **Bank consortium:** Represented this consortium, with Deutsche Bank Luxembourg S. A. as facility agent, in connection with the provision of a €500 million revolving credit facility, secured by a comprehensive security package involving various jurisdictions, and a €304 million high-yield bond to Heidelberger Druckmaschinen AG.
- **Bank consortium:** Represented this consortium, with Unicredit Bank AG's London branch as agent, in connection with the refinancing of a portion of Xella International S.A.'s outstanding indebtedness.
- **Bank consortium:** Represented a group of five banks, led by HSH Nordbank AG as facility agent, in Deutsche Beteiligungs AG's acquisition of Spheros Group from financial investors Baird Capital Partners and Capcellence.
- **Deutsche Bank AG:** Represented the bank's New York branch in connection with a US\$2.1 billion senior secured credit facility (comprising a US\$1.8 billion term facility and a US\$300 million revolver facility) for Colfax Corporation. This was one of the first syndicated leverage financings done in compliance with the recently revised UK Takeover Code.

## Insights

- Author of multiple news reports for *The Capitol Forum*
- Co-author, "IRC Section 382 and Restrictive Claims Trading Orders in Bankruptcy," *The Tax Section of The Florida Bar*, Vol. XXVI, No. 6, August 2009 (with David H. Dreier)
- Contributing author, "Winning Over the Client-Partner: Outgrowing the Nervous Newbie," *American Bankruptcy Institute Journal*, March 2009
- Co-author, "Healthcare Cases – Get Thee to a Specialist, Stat," *The Bankruptcy Strategist*, November and December 2008

## Activities and Affiliations

### Prior and Present Employment

Malka began and spent the bulk of her career as an associate in the Financial Restructuring & Insolvency and Bank Finance departments of global law firm White & Case LLP, in its Miami, Washington, and Munich offices. Malka's

practice there focused on representing debtors in possession, creditors committees, equity security holders, trustees and institutional lenders acting in various capacities in Chapter 11 bankruptcy proceedings, as well as in foreign and non-bankruptcy restructurings; as well as banks, investors and companies concerning German domestic and cross-border finance transactions, including secured and unsecured leveraged buy-outs with senior, mezzanine and bank/bond high yield structures, as well as restructuring of existing financing.

Immediately prior to joining Dentons, Malka served as Vice President, Compliance at The Capitol Forum, a news publication where she was originally brought on as Senior Correspondent to help build a bankruptcy product. Before that, while living in Germany, Malka served as the sole US-qualified corporate legal counsel to Treofan Germany GmbH & Co. KG, an international BOPP (biaxially oriented polypropylene film) manufacturing company.

Malka began her career in financial restructuring and reorganization as a paralegal at Gibson, Dunn & Crutcher LLP. She then taught legal research and writing while in law school, and spent her first summer working at an Italian boutique firm in Rome. In addition to her US legal credentials, she is qualified as a solicitor (non-practicing) in England and Wales.

## Areas of focus

### Practices

- Banking and Finance
- Corporate
- Litigation and Dispute Resolution
- Restructuring, Insolvency and Bankruptcy
- Securities and Corporate Finance

### Industry sectors

- Energy
- Financial Institutions
- Government
- Infrastructure and PPP
- Life Sciences and Health Care
- Manufacturing
- Luxury, Fashion and Beauty

## Education

- Georgetown University Law Center, 2005, JD
- Harvard College, 2000, AB, Literature, *cum laude*

## Admissions and qualifications

- District of Columbia
- Florida

- Solicitor, England and Wales, non-practicing
- United States Supreme Court
- US District Court for the District of Columbia



# David F. Cook

## Associate



Associate

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## Overview

David is a member in our Restructuring, Insolvency and Bankruptcy group. He regularly represents debtors, official committees, ad hoc groups, secured and unsecured creditors, lenders, distressed-asset buyers, court-appointed trustees and other stakeholders in an array of insolvency and restructuring matters. He also has extensive experience litigating in bankruptcy court, including prosecuting, defending and mediating avoidance actions under Chapter 5 of the Bankruptcy Code.

## Insights

- Author, "Straddling the Line: Delaware Bankruptcy Court Rules That Not All Tax Liabilities Incurred During a Debtor's Petition Year are Eligible for Administrative Expense Priority," *The Delaware Bankruptcy Insider*, October 24, 2019
- Author, "Insider's Scoop: Judge Silverstein Imposes Heightened Standard Regarding Appointment of Future Claims Representative," *The Delaware Bankruptcy Insider*, June 27, 2019
- Author, "Delaware Bankruptcy Court Rejects Per Se Premise that a Discretionary Bonus Payment Can Never Be on Account of 'Value,'" *The Delaware Bankruptcy Insider*, May 30, 2019
- Author, "On a Mission: Supreme Court Clarifies Effect of Rejection of Executory Contract," *The Delaware Bankruptcy Insider*, May 23, 2019
- Author, "Delaware District Court Agrees That Plans Need Not Reflect Bargained For Priority Provisions in Subordination Agreements," *The Delaware Bankruptcy Insider*, October 25, 2018
- Author, "Judge Silverstein Tosses Bad Faith Filing in Rent-A-Wreck of America But Doesn't Award Sanctions —Finds That a Filing to Employ the Powers of the Code is Alone Insufficient to Support Good Faith," *The Delaware Bankruptcy Insider*, June 1, 2018

## Activities and Affiliations

- Delaware State Bar Association
- American Bar Association
- Delaware Bankruptcy American Inn of Court
- Turnaround Management Association

## Prior and Present Employment

Prior to joining Dentons, David was an attorney in the Bankruptcy and Insolvency practice group at Ashby & Geddes, P.A., in Wilmington, DE. Before that, he worked as a law clerk for the Hon. Mary M. Johnston of the Superior Court of the State of Delaware, Complex Commercial Litigation Division.

## Areas of focus

### Practices

- Restructuring, Insolvency and Bankruptcy

## Education

- Washington and Lee University School of Law, 2016, JD
- Guilford College, 2013, BA, with honors

## Admissions and qualifications

- Delaware
- Practice supervised by DC Bar members pursuant to DC Bar Rule 49(c)(8)

## Languages

- English

# Andrea Hall

## Associate

Associate

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## Overview

Andrea Hall is an associate in Litigation and Disputes Resolution practice group. Her practice focus is on representing insurers in a wide range of insurance-related disputed matters, including claim, coverage and bad faith litigation.

Andrea has managed complex discovery, including document reviews and depositions, and other aspects of pre-trial preparation, in large-scale civil litigation. She has also provided legal research and analysis and other critical litigation support during trial.

Andrea clerked for the Office of Chief Counsel, Internal Revenue Service, and served as a judicial extern for the Honorable Richard Seeborg of the US District Court for the Northern District of California.

## Activities and Affiliations

### Prior and Present Employment

Immediately prior to joining Dentons, Andrea was an associate at H5, provider of e-discovery, technology-assisted review, critical document identification and case preparation support, where she managed large-scale document review projects.

## Areas of focus

### Practices

- Litigation and Dispute Resolution

### Industry sectors

- Insurance

## Education

- University of California, Berkeley, School of Law, 2017, JD, Dean's Fellowship; Member, *Berkeley Technology Law Journal*; Participant, Law & Technology Writing Workshop
- Harvard University, 2008, MA, Samuel H. Kress Foundation Dissertation Research Fellowship
- University of California at Berkeley, 2005, BA, Maybelle M. Toombs Award for Outstanding Undergraduate Research

## Admissions and qualifications

- California

## Languages

- Dutch
- French
- German

# Ryan C. Westhoff

## Partner



Partner

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## Overview

Ryan Westhoff is a partner in Dentons' Real Estate practice in Kansas City. With more than 10 years of extensive experience, Ryan counsels developers, businesses, private equity funds, real estate investment trusts (REITs), banks and servicers on all facets of complex commercial real estate transactions. Ryan's practice encompasses the development, redevelopment, construction, financing, leasing, purchase and sale of a broad range of asset classes, including office and industrial buildings, shopping and entertainment centers, hospitals and senior living facilities, hotels and resorts, apartments, and mixed-use properties throughout the United States. He also works closely with his clients on issues relating to bond financing and economic development entitlements and incentives, including tax credits, property tax abatement and special taxing districts, such as community improvement and transportation development districts.

Ryan's recent high-profile deals include the transfer of a multi-state portfolio of hospitals and medical office buildings in connection with the combination of one of the largest nonprofit health systems in the western United States, as well as the representation of a global sports entertainment company in its land acquisition, ground leasing, site development, and sale-leaseback financing activities throughout the country.

Drawing from his background in architecture, Ryan maintains an active practice in the design and construction industry, advising on contracting and enforcement issues arising on construction projects. He also regularly works alongside Dentons' Corporate practice and Health Care practice, handling real estate matters as a component of mergers and acquisitions and of larger asset and financing transactions.

Initially trained as a litigator, Ryan has managed a wide variety real estate disputes involving construction, foreclosures, complex mechanics' liens, surety bonds, condemnation and landlord/tenant claims in US state, federal and bankruptcy courts.

Ryan earned his Leadership in Energy and Environmental Design Accredited Professional (LEED AP®) accreditation from the US Green Building Council in 2008.

## Recognition

- *Super Lawyers*, Rising Stars, Missouri, 2014-2019

# Insights

- "An Important Risk to Consider When a Contractor 'Teams' with a Bonded Prime Contractor on a Federal Project," newsletter for Division 7, the American Bar Association Forum on Construction, Issue 2012-04, October 2012
- "Missouri's One and Only Court of Appeals," *Journal of the Missouri Bar*, 2008

## Activities and Affiliations

### Presentations

- Panelist, CREW KC, "Impact on weed in commercial real estate," January 2020
- "Select Issues in Business Insolvency Law – Mechanics' Liens and Bankruptcy: A Tale of Two Bankruptcies," CLE for the Kansas City Bankruptcy Bar Association and the Turnaround Management Association, November 2013

### Memberships

- Urban Land Institute (ULI), Kansas City Chapter
- International Council of Shopping Centers (ICSC)
- The Jefferson Society, Inc.
- American Bar Association
- Missouri Bar Association
- Board of directors of Wildwood Outdoor Education Center, Inc., a nonprofit dedicated to keeping youth engaged in high-quality outdoor experiential learning

## Areas of focus

### Practices

- Commercial Development
- Construction
- Development Zoning and Planning
- Project Finance
- Real Estate
- Real Estate Finance
- Real Estate Leasing Occupation and Operation

### Industry sectors

- Cannabis

- United States
- Kansas City

## Education

- University of Missouri-Columbia, 2008, JD
- Kansas State University, 2005, Bachelor of Architecture

## Admissions and qualifications

- Kansas
- Missouri
- US Court of Appeals for the Tenth Circuit
- US District Court for the District of Kansas
- US District Court for the Western District of Missouri

# Isabella C. Hsu

## Managing Associate

Managing Associate

Los Angeles

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## Overview

Isabella C. Hsu is a member of Dentons Litigation and Dispute Resolution practice. Isabella focuses her practice on commercial litigation, class actions, and products liability and complex torts. She has extensive experience in product liability litigation and has defended several major global automobile manufacturers and multinational automobile component manufacturers in state and federal courts.

Isabella has drafted and argued motions, handled all phases of discovery, and represented clients in settlement negotiations and mediations.

In addition, Isabella actively performs pro bono matters and has successfully handled numerous matters through Alliance for Children's Rights.

## Experience

- **Global automobile manufacturer:** Representation in multi-district litigation relating to Takata airbag inflator ruptures.
- **Global automobile manufacturer:** Served as sole local counsel on product liability case.
- **Multinational media and entertainment conglomerate:** Obtained summary judgment in premises liability case.
- **Local newspaper:** Assisted in drafting successful anti-SLAPP motion leading to dismissal of the case and recovery of all attorneys' fees for the client.
- **Global automobile manufacturers:** Advised autonomous vehicle subsidiaries on legislative and permitting requirements.

## Insights

- Co-author, "Automobile Data Recording is Not an Invasion of Privacy," *Law360*, June 19, 2014



# Activities and Affiliations

- Member, Asian Pacific American Bar Association of Los Angeles County (2015–present)
- Pro Bono Advisory Council, Asian Americans Advancing Justice – Los Angeles (2019–present)

## Prior and Present Employment

Prior to joining Dentons, Isabella was a litigation associate at a leading national law firm.

# Areas of focus

## Practices

- Litigation and Dispute Resolution
- Commercial Litigation
- Class Action Defense
- Product Liability and Complex Torts

## Industry sectors

- Automotive
- Media, Entertainment and Sports

# Education

- University of California at Los Angeles, School of Law, 2015, JD
- University of Southern California, 2012, BA, *magna cum laude*

# Admissions and qualifications

- California
- US Court of Appeals for the Ninth Circuit
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

# Languages

- English
- Mandarin

# Geoffrey Miller

## Senior Managing Associate



Senior Managing Associate

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## Overview

Geoffrey Miller is a member of Dentons' Restructuring, Insolvency and Bankruptcy practice. He advises debtors, creditors and other significant stakeholders in chapter 11 cases, out of court restructurings and cross-border insolvency proceedings. Among other things, Geoff regularly represents debtors in the healthcare industry as well as private equity funds and other acquirers of financially distressed businesses and loans including in enforcement matters. He also represents insurers and insurance related entities in bankruptcy cases, including in bankruptcy cases arising from mass torts such as asbestos exposure.

## Experience

### Company/Debtor

- *Verity Health System of California, Inc.* (Chapter 11 - Central District of California, August 2018-present): Representing parent not-for-profit company and 16 related entities, including 6 significant operating hospitals, in the second largest hospital bankruptcy case in American history. Closed the sale of two hospitals for \$235 million, over the objections of various parties, including the California Attorney General. Also obtained court approval of the sale of the debtors' remaining assets for \$610 million. This sale is currently under review by the California Attorney General.
- *Astria Health* (Chapter 11 - Washington, May 2019-present): Representing Astria Health System in a recent filing of 13 related chapter 11 cases. The Astria Health system, headquartered in the heart of Yakima Valley, Washington, is the largest non-profit healthcare system based in Eastern Washington, with annual revenues of approximately \$240 million. Among other things, obtained court approval of postpetition financing over the objections of secured lenders, closed one underperforming hospital, obtained court approval to sell certain assets of the debtors assets, and successfully negotiated a joint plan of reorganization with the debtors' largest secured lender.

### Insurance and Mass Tort

- Represents insurance companies holding in excess of \$1 billion of subrogation claims in the Pacific Gas & Electric Corp. bankruptcy case, the largest Chapter 11 utility bankruptcy in US history.

- Represents an insurer in the Imerys Inc. America bankruptcy case in connection with matters related to insurance coverage of Imerys and its affiliates.
- Represents an insurer in the USA Gymnastics chapter 11 case in connection with insurance coverage provided to USA Gymnastics.
- Advises certain insurance companies in connection with potential coverage issues arising from their insureds' liability arising from opioid manufacturing and distribution, including in the Purdue Pharmaceuticals bankruptcy case.
- Represented insurance carriers in asbestos-related bankruptcies, most recently in *In re: Budd Company*, *In re: Oakfabco*, and *In re C.P Hall Company* in the Northern District of Illinois, in *In re The Fairbanks Company*, in the Northern District of Georgia. Each of these representations resulted in a resolution of the insurer's alleged coverage obligations through a settlement with the debtors.
- Represented directors & officers and various related entities in the cross-border bankruptcy and insolvency proceedings of Montreal, Maine & Atlantic Railway, Ltd., a mass tort case that achieved an unprecedented \$400 million settlement fund to be administered jointly between the debtors' US and Canadian estates.

### Other Experience

- Represented restaurant franchisor in chapter 11 bankruptcy filed by one of its largest franchisees. Successfully negotiated a settlement with the franchisee which resulted in payment of over \$13 million of past-due royalties to the franchisor.
- Represented the foreign representative in the chapter 15 insolvency proceedings of *In re: Bluberi Gaming Technologies*.
- Outside of bankruptcy, Geoff also has significant experience representing clients in complex litigation with a focus on insurance related litigation.

## Insights

- "Recent Developments Regarding the Interface Between Insurance and Bankruptcy," ABA Section of Business Law, Business Bankruptcy Committee
- "Bankruptcy Notice Lessons From Lyondell", Law 360, April 2018
- "Lyondell on the Imputation of Fraudulent Intent," *American Bankruptcy Institute Journal*, December 2016
- "Bullard: Order Denying Confirmation Is Not Automatically Appealable," *American Bankruptcy Institute Journal*, August 2015
- "Actual-Creditor Requirement Survives § 106(a)'s Abrogation of Sovereign Immunity," *American Bankruptcy Institute Journal*, June 2014
- "Statute of Limitations for Avoidance Actions are not Topped by the Appointment of an Interim Trustee in the Seventh Circuit," *ABI Bankruptcy Litigation Committee Newsletter*, October 2013
- "Severance Payments Made to Executives Pursuant to a Plan Might Avoid 503(c)'s Limitations," *American Bankruptcy Institute Journal*, August 2013
- "Circuits Disagree Regarding Whether Funds in an IRA Inherited by a Nonspouse Debtor Are Property of the Estate," *ABI Consumer Bankruptcy Committee Newsletter*, July 2013
- "Oldco: Does a Failure to Respond Equal Implied Consent?," *American Bankruptcy Institute Journal*, June 2013
- "Two BAP Decisions Consider LIHTCs When Valuing Affordable Housing," *American Bankruptcy Institute Journal*, February 2013

# Activities and Affiliations

## Memberships

- Chair, Business Law Section Business Bankruptcy Committee, Mass Torts and Environmental Claims Subcommittee (2019 - present)
- Member, Bankruptcy Court Liaison Committee, U.S. Bankruptcy Court, Northern District of Illinois (2017 - 2019)
- Member, Turnaround Management Association, NextGen Committee

## Prior and Present Employment

Prior to joining Dentons, Geoff served as a judicial clerk in the United States Bankruptcy Court for the District of Arizona where he worked for the Hon. Charles G. Case II until his retirement, and then for the Hon. Daniel P. Collins (Chief Judge). Geoff also served as an extern for Judge Sean H. Lane in the United States Bankruptcy Court for the Southern District of New York, Judge Arthur B. Federman in the United States Bankruptcy Court for the Western District of Missouri and Magistrate Judge Robert E. Larsen in the United States District Court for the Western District of Missouri.

## Areas of focus

### Practices

- Commercial Litigation
- Restructuring, Insolvency and Bankruptcy
- Insolvency Litigation and Enforcement
- Financial Institution Insolvency

## Education

- St. John's University School of Law, 2012, LL.M., Bankruptcy
- University of Missouri-Kansas City School of Law, 2011, JD, *magna cum laude*; Note & Comment Editor, *UMKC Law Review*
- University of Kansas, 2007, BS, Finance

## Admissions and qualifications

- District of Columbia
- Illinois
- New York
- US District Court for the Northern District of Illinois

# Lauren Macksoud

## Senior Managing Associate



Senior Managing Associate

New York

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## Overview

Lauren is a member of Dentons' Restructuring, Insolvency and Bankruptcy practice group. She represents clients in and out of court in stressed, distressed, workout, insolvency and bankruptcy situations. Lauren has experience representing debtors, creditors, creditors' committees and other parties in interest in chapter 11 reorganizations and chapter 7 liquidations. In addition, she has represented creditors in fraud investigations and commercial litigations in federal and state courts.

Some of Lauren's notable engagements include the representation of the unsecured creditors committees in the General Motors and Chrysler bankruptcy proceedings and the representation of the debtor in the Saint Vincent's Catholic Medical Center chapter 11 liquidation. Lauren also has experience representing lenders in various types of energy-efficiency project finance transactions.

Lauren served as a law clerk to the Honorable Novalyn L. Winfield, United States Bankruptcy Judge for the District of New Jersey. She is a graduate of Rutgers School of Law and Boston University.

## Experience

### Distressed investing

- Representing a chapter 11 plan sponsor in the acquisition of a mining company.
- Representing the purchaser of a used auto parts company.
- Represented the purchaser of a mining company through a Chapter 11, Section 363, sale process.
- Represented the purchaser of a business consulting firm through a Chapter 11, Section 363, sale process.

### Committee committees

- Official Committee of Unsecured Creditors in General Motors: Represented in chapter 11 bankruptcy proceedings.

## Debtor representations

- The Saint Vincent's Catholic Medical Center: Represented the debtor in a chapter 11 liquidation.

## Lenders

- Representing a DIP lender in the bankruptcy of a New York-based construction project.
- Represented a lender with respect to a battery storage development loan transaction.
- Represented a lender with respect to cogeneration system development project.

## Indenture trustees

- Representing a DIP indenture trustee in a US\$375 million issuance as foreign counsel across multiple European countries and Australia.
- Represented indenture trustee as global counsel in the US and multiple Asian countries in the issuance of US\$650 million of notes upon the consummation of a prepackaged plan of reorganization.

## Insights

- Co-author, "GME @ Dentons: Hahnemann bankruptcy to leave residents without malpractice insurance," *Dentons Insights*, December 5, 2019
- Co-author, "Material Adverse Effect Clauses are Enforceable in Delaware," *American Bankruptcy Institute Journal*, March 2019
- Co-author, "Does the Second Circuit in Sabine Have the Final Word on Texas Law?," *American Bankruptcy Institute Journal*, August 2018
- Co-author, "Merit: Safe-Harbored No More?," *American Bankruptcy Institute Journal*, April 2018
- Co-author, "A Momentive Performance: Second Circuit Sets Interest Rate Standard and Denies Make Whole in Momentive Cramdown Plan," *American Bankruptcy Institute Journal*, January 2018

## Activities and Affiliations

Lauren is a board member for the Animation Project, a nonprofit that uses digital art technology as a therapeutic medium and workforce development tool to nurture the social, emotional and cognitive growth of at-risk youth.

## Prior and Present Employment

- New York City Energy Efficiency Corporation
- Kramer Levin Naftalis & Frankel LLP
- Thacher Proffitt & Wood
- Law clerk, Hon. Novalyn L. Winfield, US Bankruptcy Court for the District of New Jersey

## Areas of focus

- Restructuring, Insolvency and Bankruptcy
- Creditor and Equity Committee Representation
- Debtor Representation
- Distressed M&A, Investing and Debt Trading
- Out-of-Court Restructurings and Work-outs
- Commercial Litigation
- Capital Markets

## Industry sectors

- Distressed Asset Investors

## Education

- Rutgers University School of Law-Newark, 2003, JD
- Boston University, 2000, BS, Communications/Public Relations

## Admissions and qualifications

- New Jersey
- New York
- US Bankruptcy Court for the District of New Jersey
- US Bankruptcy Court for the Eastern District of New York
- US Bankruptcy Court for the Southern District of New York

# Ashley Minton

## Associate



Associate

Kansas City

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## Overview

Ashley Minton is an Associate in Dentons' Corporate group.

## Areas of focus

### Practices

- Corporate

## Education

- Boston University School of Law, 2016, LL.M., Tax
- University of New Mexico School of Law, 2015, JD
- University of Oklahoma, 2011, Master in Public Administration

## Admissions and qualifications

- Kansas



# Eitan Kagedan

## Associate



Associate

Chicago

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## Overview

Eitan is a member of Dentons' Commercial Litigation practice group with a focus on Competition and Antitrust issues. Eitan has represented clients in complex matters involving federal and state antitrust and unfair competition law, breach of contract, insurance coverage and media privacy matters. Eitan has also advised clients on antitrust compliance, responding to government antitrust investigations and merger clearance.

Eitan received the highest honor for his senior thesis in philosophy while attending Rutgers University. He also received the Jacob Cooper Prize in Logic from the university's Department of Philosophy, along with recognition for outstanding community service.

Eitan holds citizenship in the US, the UK and Canada.

## Insights

- Co-author, "FTC revises Hart-Scott-Rodino thresholds for 2020," Dentons client alert, January 29, 2020

## Activities and Affiliations

- AVODAH: The Jewish Service Corps
- AmeriCorps, Alumni

## Prior and Present Employment

As a law clerk at Laurie & Brennan, LLP, Eitan assisted with document review and discovery strategy development. He published blog posts and newsletter articles on trends in the legal field.

During the summer of 2015, Eitan clerked for the Honorable Diane J. Larsen of the Circuit Court of Cook County, Illinois, Chancery Division. He conducted legal research and prepared draft judicial opinions and bench memoranda on administrative review and declaratory action cases. He also served as a non-attorney representative at the Urban Justice Center-Mental Health Center in New York, managing cases for people who were denied Social Security

## Areas of focus

### Practices

- Alternative Dispute Resolution (ADR)
- Commercial Litigation
- Competition and Antitrust
- Competition and Antitrust Counseling and Compliance
- Competition and Antitrust Litigation
- Employment and Labor
- Litigation and Dispute Resolution

## Education

- Northwestern University School of Law, 2017, JD, *cum laude*, articles review board and assistant executive editor, *Journal of Criminal Law and Criminology*
- Rutgers University, 2012, BA, Philosophy and Political Science, magna cum laude

## Admissions and qualifications

- Illinois

## Languages

- English

# Jonathan DiChiara

## Associate



Associate

Atlanta

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## Overview

Jonathan DiChiara focuses his practice on advising corporate clients with respect to their strategic business transactions, including mergers, acquisitions and equity financings. As a member of Dentons' Corporate practice, Jonathan has experience counselling public and private companies on a wide variety of business matters, including business formation, commercial contracts, corporate governance and securities law compliance.

## Areas of focus

### Practices

- Corporate
- Corporate Governance
- Securities and Corporate Finance

## Education

- Emory University School of Law, 2018, JD, with Honors
- University of South Carolina, 2015, B.A. History, Magna Cum Laude, Phi Beta Kappa

## Admissions and qualifications

- Georgia



# Karleen Murphy

## Counsel



Counsel

Los Angeles

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## Overview

Karleen Murphy is a member of Dentons' Litigation and Dispute Resolution practice, where she focuses her practice on toxic tort and product liability.

With 20 years of civil litigation experience, Karleen defends high profile corporate clients at trials in state and federal courts in California and other jurisdictions. She is skilled at developing and implementing successful litigation strategies. She has extensive deposition experience, having deposed and defended medical, economic and industrial hygiene experts, and corporate representatives, as well as taken numerous plaintiffs and third party witness depositions. In addition, she resolves high dollar value cases through alternative dispute resolution, including mediation and arbitration, and direct settlement negotiations.

Karleen has been a featured speaker at civil litigation legal conferences and served on court ordered committees to amend Los Angeles local rules and trial procedures. In 2013, she studied International Entertainment, Media and Sports Law at the University of London.

## Experience

- **Major Talc Supplier:** *Herford v. Johnson & Johnson, et al.*, Case No. BC646315 Los Angeles Superior Court, trial team member for talc supplier to Johnson & Johnson in living mesothelioma case resulting in complete defense verdict in November 2017.
- **Major Talc Supplier:** *Lyons v. Metropolitan Life, et al.*, Case No. CGC-16-276495, San Francisco Superior Court, Order Granting Reconsideration of Denial of Motion for Summary Judgment and Further Order Granting Motion for Summary Judgment.
- **Major Talc Supplier:** *Anderson v. Borg Warner Corporation, et al.*, Case No. BC666513, Order Granting Motion for Summary Judgment.
- **Boiler Manufacturer at Refinery:** *Rollins. v. Foster Wheeler, et al.*, Los Angeles Superior Court, Judgment Notwithstanding Verdict.
- **Navy Boiler Manufacturer:** *Richard Belt v. Crown Cork & Seal and Foster Wheeler Corporation*, Case No.

- **Navy Boiler Manufacturer:** *Ruben Flores v. Bondex International Inc. et al.*, Case No. BC333511 Los Angeles Superior Court, defense verdict for Foster Wheeler in living mesothelioma case.
- **Navy Boiler Manufacturer:** *Tamara Kapraun (WD Joseph Krotzer) v. Crane Co. et al.*, Case No. BC332560 Los Angeles Superior Court, motion for non-suit granted for Foster Wheeler in wrongful death mesothelioma case.
- **Raw Asbestos Fiber Supplier:** *Carmen Nunez v. Special Electric Company Inc, et al.*, Case No. BC410790 Los Angeles Superior Court, defense verdict for Special Electric in living mesothelioma case.
- **Valve Manufacturer:** *Elaine Paulus (WD William Paulus) v. NIBCO Inc., et al.*, Case No. BC437739 Los Angeles Superior Court, defense verdict on for NIBCO Inc. in wrongful death mesothelioma case.

## Insights

- Author, "The Perspective of Women in Talc Litigation," *For the Defense Magazine - Defense Research Institute*, January 2020
- Speaker, "Ethical Duties in Technological Competence," Dentons' CLE for In-House Counsel, Los Angeles, CA, January 17, 2020
- Speaker, "The Perspective of Female Litigators in Cosmetic Talc Cases," Talc Litigation: Medical and Scientific Issues, dri Symposium, Washington DC, September 19, 2019
- Author, "The US Supreme Court Sinks The Bare Metal Defense For Product Manufacturers and The Foreseeability Test For Plaintiffs In Maritime Tort Law Asbestos Case: A Deep Dive Into *Air & Liquid Systems Corp., et al. v. DeVries, et al.* (2019), ABA Toxic Tort and Environmental Law Committee News Summer 2019
- Speaker, "The US Supreme Court - Recent Cases and Trends," Dentons' CLE for In-House Counsel, St. Louis, MO, June 7, 2019
- Author, "Not All Talc Cases Are Alike: Critical Distinctions in Navigating Through Emerging Talc Litigation," *DRI The Voice Of The Defense Bar*, February 2017
- Author, "Los Angeles Superior Court's New Case Management Order Targets Full Disclosure of Asbestos Exposure From Bankrupt Entities," *Asbestos Magazine*, October 2015
- Law Review Issue Comment, A Hearsay Exception For Physical Abuse, 27 G.G.L.Rev. 497
- Panel Speaker, DRI Asbestos Medicine Seminar- Trial Lawyers Symposium, November 7, 2018, Austin, Texas

## Activities and Affiliations

- American Women Lawyers in London
- Sports' Lawyers Association
- International Law Association of Los Angeles County Bar

## Areas of focus

### Practices

- Litigation and Dispute Resolution

- Insurance

## Industry sectors

- Construction
- Defense and Space
- Insurance
- Manufacturing
- Media, Entertainment and Sports

## Education

- Golden Gate University School of Law, 1998, JD
- University of Washington, 1994, BA, English

## Admissions and qualifications

- California
- New York
- Oregon
- Washington
- United States Supreme Court
- US District Court for the Central District of California
- US District Court for the Eastern District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

# Carol Yur

## Associate



Associate

Los Angeles

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## Overview

Carol Yur is an associate in the Los Angeles office and a member of Denton' Litigation and Dispute Resolution practice and Employment and Labor group. She has defended employers in wage-and-hour class actions and Private Attorneys General Act (PAGA) lawsuits; in cases alleging employment discrimination, wrongful termination and retaliation; and in other employment-related disputes, including administrative actions before the US Equal Employment Opportunity Commission. Her work has included drafting responsive pleadings, crafting discovery responses and requests and calculating exposure damages in wage-and-hour cases. As a member of the defense team in a breach of contract and fraud case, she won a motion to stay on *forum non conveniens* grounds.

Carol has also represented businesses in patent cases across a wide range of technical areas, from Coriolis flow meters to lip synchronization animation, including drafting motions to stay and *in limine*, and an *ex parte* application to strike; and twice served as law clerk, first to Judge Lois H. Goodman of the US District Court of New Jersey, where she analyzed and reviewed motions and letter requests in employment-related disputes, breach of contract actions, and other civil matters; and then in Los Angeles County Superior Court, where she drafted opinions on demurrers; writs of mandate and attachment; and various motions, including for an appointment of a receiver, injunctive relief and set-aside of a default judgment.

## Insights

- "Keeping Your Eye On The Ball: California Localities Increase Minimum Wage Effective July 1, 2020,"  
Dentons client alert, June 11, 2020

## Activities and Affiliations

### Prior and Present Employment

Immediately prior to joining Dentons, Carol was a litigation and employment associate in the Los Angeles office of another global law firm. After graduating from law school, she served as a law clerk to US Magistrate Judge Lois H. Goodman, District of New Jersey, followed by a clerkship in Los Angeles County Superior Court. During law school,



## Areas of focus

### Practices

- Employment and Labor
- Litigation and Dispute Resolution

## Education

- University of Michigan Law School, 2012, JD, Associate Editor and Contributing Editor, *Michigan Journal of International Law*, Pro Bono Chair, Environmental Law Society
- University of California at Berkeley, 2010, BA, with Distinction in General Scholarship

## Admissions and qualifications

- California
- US District Court for the Central District of California
- US District Court for the Northern District of California
- US District Court for the Southern District of California

# Nicholas Carson

## Managing Associate



Managing Associate

Chicago

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## Overview

Nick is a member of Dentons' Real Estate practice group, focusing on the acquisition, disposition and financing of, and tax-advantaged investing, in a diverse range of commercial, industrial, mixed-use and multifamily real estate assets. Prior to joining Dentons, Nick was an associate in the real estate practice group of Kirkland & Ellis LLP in Chicago. He served as a Public Interest Law Initiative (PILI) fellow at Business and Professional People for the Public Interest in the summer of 2015.

## Areas of focus

### Practices

- Real Estate
- Real Estate Finance
- Tax
- Tax Credits and Tax-Advantaged Investing

## Education

- Northwestern University School of Law, 2015, JD, cum laude, Online Managing Editor, *Northwestern University Law Review*
- Savannah College of Art and Design, 2012, MA, historic preservation
- Purdue University, 2008, BA, political science

## Admissions and qualifications

- Illinois

# Ashley Ring

## Associate

Associate

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## Overview

Ashley is an Associate in Dentons' Hotels and Leisure practice group. She focuses her practice on representing owners, investors and developers in various hospitality and leisure transactions around the world, including the management, acquisition, joint venture, financing and development of hotels, resorts, spas, restaurants, golf courses and other hospitality related facilities and amenities.

Prior to joining the Denton's team, Ashley was lead counsel for retail and office real estate transactions at a publicly traded tech company, with a focus on acquisitions and development. In particular, her experience includes acquisitions and dispositions, development and redevelopment projects, sale leaseback transactions, and commercial leasing.

## Recognition

- Dentons' Hotels and Leisure practice is recognized by *Chambers and Partners* with a "Band 1" national ranking—the highest available—in the Leisure and Hospitality category @ *Chambers USA: America's Leading Lawyers* every year since 2007.

## Activities and Affiliations

- Arizona Asian American Bar Association
- Head Coach of the Arizona State University International Commercial Arbitration Team

## Areas of focus

### Practices

- Corporate

- Real Estate
- Hotels and Leisure

## Industry sectors

- Golf
- Hotels
- Gaming
- Marinas
- Mixed-Use Properties
- Resorts
- Restaurants
- Ski Resorts
- Spa and Wellness

## Education

- Sandra Day O'Connor College of Law at Arizona State University, 2015, JD
- Purdue University, 2011, BA

## Admissions and qualifications

- Arizona

## Languages

- English

# Casey Doherty

## Senior Managing Associate



Senior Managing Associate

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## Overview

Casey is a senior managing associate in the Houston office and has a dual practice in Litigation and Dispute Resolution and Restructuring, Insolvency and Bankruptcy. Casey has represented clients across a broad range of industries and legal disputes.

Casey has served as first-chair trial counsel for a restaurant leaseholder in a dispute with its landlord over the rental price and property rights. In a major Chapter 11 bankruptcy, Casey served as first-chair for an oil prospector in bankruptcy over a dispute between a developer client and the debtor and a secured lender over lease rights under a joint operating agreement. Casey also served as counsel for a warehouseman storing oil and gas equipment in another major oil and gas bankruptcy and obtained a favorable workout with the debtor and other interested parties.

Other trial experience includes defending a mining company in a US\$100 million Texas Uniform Fraudulent Transfer Act (TUFTA) case; defending a home builder in a one-week jury trial in a high-end home construction dispute (the plaintiff got nothing); representing the purchaser of wind turbines at auction, as plaintiff, in a jury trial arising from a dispute with the auction house (obtained the full amount of actual damages sought); defending a Canadian real estate business in a Texas court (dismissed for lack of jurisdiction (upheld on appeal which Casey also drafted)); representing a landlord-hospital as plaintiff in a jury trial against a tenant-clinic (obtained verdict of eviction); and defending a party to a distributorship agreement in a jury trial involving allegations of Deceptive Trade Practices Act (DTPA) violations and breach of contract.

In addition, Casey represented a pipeline company in an interstate gas pipeline suit involving the issue of federal preemption and the limits of removal jurisdiction, and various state law defenses; went to bat for a group of executives over an attempt by their former employer to prevent them from starting a competing business; represented a drilling entity in two related lawsuits alleging breach of contract and patent infringement against a major energy company; and defended a media entity against claims that moneys it received for the airing of commercials were recoverable as a fraudulent transfer.

After earning his JD from NYU School of Law, Casey served as a law clerk in the US Bankruptcy Court in the Northern District of Texas, where he researched and wrote a number of opinions on avoidance actions filed against early-stage investors in a Ponzi scheme, and an opinion addressing a constitutional challenge to the authority of Article I courts, including bankruptcy courts, in light of a recent Supreme Court decision that placed limits on

## Insights

- "Energy Restructuring and Reorganization," *The Texas Journal of Oil, Gas, and Energy Law*, December 2014
- Co-author, "Selected Issues Regarding Overriding Royalty Interests, Net Profits Interests and Production Payments in Oil and Gas Bankruptcies," State Bar of Texas Benefit/Bar Conference, June 2013

## Activities and Affiliations

### Community Involvement and Pro Bono

- United Way Young Leaders

## Areas of focus

### Practices

- Commercial Litigation
- Litigation and Dispute Resolution
- Restructuring, Insolvency and Bankruptcy
- Appellate Advocacy
- Real Estate
- Employment and Labor

### Industry sectors

- Oil and Gas
- Commercial Banks
- Mining

## Education

- New York University, School of Law, 2011, JD
- Boston College, 2008, BA, *cum laude*

## Admissions and qualifications

- Texas

## Languages

- English

# Jasmine M. Fisher

## Managing Associate



Managing Associate

Washington, DC

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## Overview

Jasmine M. Fisher is a managing associate in Dentons' Washington DC office and a member of its global Life Sciences and Health Care group. She advises clients on health care regulatory and FDA matters relating to medical devices, technologies, and pharmaceuticals; health care privacy issues; and government audits and investigations. Her clients include health care industry manufacturers, distributors, and providers, digital health start-ups and mobile application developers, nonprofit organizations, businesses in emerging technologies, and international companies entering US markets.

## Recognition

### Honors and Awards

- *Best Lawyers in America: Ones to Watch, Health Care Law, 2021*

## Insights

- Co-author, "Medicare Coverage of Innovative Technology: CMS Proposes Rapid Approval Pathway for FDA Breakthrough Devices," Dentons client alert, September 3, 2020
- Co-author, "FDA issues digital health policy guidance for multiple function device products," Dentons client alert, August 3, 2020
- Co-author, "Eased Controlled Substance Restrictions Due to COVID-19: Implications for Providers," *Journal of Health Care Compliance*, July/August 2020
- Co-author, "ONC releases final rule to advance interoperability and enhance ease of access to, and use and exchange of, electronic health information," Dentons client alert, March 16, 2020
- Author, "Health Care Data Privacy Trends: Risks and Costs of Third-Party Data Collection and Cyberattacks," *Journal of Health Care Compliance*, March/April 2019



- “Treasury Department issues new CFIUS regulations launching FIRRMA pilot program, requiring declarations for certain transactions,” Dentons client alert, October 19, 2018
- “CFIUS gets expanded powers over foreign inbound investments, with procedural changes on the horizon,” Dentons client alert, August 23, 2018

## Activities and Affiliations

- Chair, Life Sciences Division, ABA Science and Technology Law Section (2020-2021); Vice Chair, Life Sciences Division, ABA Science and Technology Law Section (2019-2020)
- Co-Chair, Committee on Biotechnology, Healthcare Technology and Medical Devices, ABA Science and Technology Law Section (2019-2021)

## Areas of focus

### Practices

- Corporate Governance
- Compliance
- Compliance and Risk Management
- Public Policy and Regulation
- Privacy and Cybersecurity

### Industry sectors

- Health Care
- Government Agencies
- Life Sciences and Health Care
- Technology
- Biotechnology Companies
- Fraud and Abuse Counseling, Investigations and Defense
- Life Sciences
- Manufacturers and Distributors
- Medical Device Companies
- Pharmaceutical Companies
- Information Technology and Telemedicine Companies
- Regulatory Counseling

## Education

- Boston University School of Law, 2014, JD, Editor, *Boston University Law Review*

## Admissions and qualifications

- District of Columbia
- Hawai`i
- Maryland
- US Court of Appeals for the Ninth Circuit

# Rachel L. Ross

## Associate



Associate

San Diego

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## Overview

Rachel Ross is an associate in Dentons' Litigation and Dispute Resolution practice and a member of the Firm's Commercial Litigation and Data Privacy groups. Rachel's practice focuses on complex commercial litigation, employment law, data privacy and cybersecurity.

As a Certified Information Privacy Professional (CIPP-US), Rachel assists clients in identifying, evaluating and managing risks associated with privacy and information security practices. Rachel has experience advising clients on various data security and privacy laws and regulations including the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the Gramm-Leach-Bliley Act (GLBA), Regulation S-P, and the Health Insurance Portability and Accountability Act (HIPAA), as well as various data breach notification laws and regulations. In addition, Rachel has experience representing local and multinational businesses with respect to a full range of workforce-related issues and matters, including wage and hour disputes, termination, discrimination/harassment, and employee/independent contractor classification disputes.

Rachel graduated cum laude from the University of San Diego School of Law in 2018. While in law school, Rachel served as the President and a national competitor for the Transactional Law Team and was a member of the San Diego International Law Journal. Rachel also served as a judicial extern for the Honorable M. James Lorenz and the Honorable Karen S. Crawford, both of the United States District Court for the Southern District of California.

## Areas of focus

### Practices

- Commercial Litigation
- Employment and Labor
- Privacy and Cybersecurity
- Litigation and Dispute Resolution
- Class Action Defense

## Education

- University of San Diego School of Law, 2018, JD
- University of Iowa, 2013, BA

## Admissions and qualifications

- California

## Languages

- English

# Sarah Schrag

## Managing Associate



Managing Associate

Atlanta

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## Overview

Sarah Schrag is an associate in the Atlanta office and a member of Dentons' Restructuring, Insolvency and Bankruptcy practice. Sarah focuses her practice on bankruptcy and commercial litigation. She has experience representing various parties-in-interest in Chapter 7 liquidations (voluntary and involuntary), Chapter 9 debt adjustments, Chapter 11 reorganizations, and Chapter 13 wage-earner's plans. Sarah also has experience in domesticating foreign judgments, negotiating discovery disputes, implementing preliminary injunctions, initiating garnishment suits, navigating post-judgment collection actions, and executing nonjudicial foreclosure proceedings.

Prior to joining Dentons, Sarah served as a legal intern for the United States Senate, focusing on Committee on the Judiciary matters. She also served as a legal intern to the Honorable United States Magistrate Judge Lawrence R. Leonard on the Rocket Docket, the United States District Court for the Eastern District of Virginia.

## Experience

**Astria Health** (Chapter 11 - Washington): Representing Astria Health System in a recent filing of 13 related chapter 11 cases. Located in Yakima, Washington, the health system includes three operating acute care hospitals.

## Insights

- Co-Author, "Value, Not Face Amount, of Liens Controls in a Battle of Credit Bids," *American Bankruptcy Institute Journal*, July 2017
- Co-Author, "Supreme Court Closes 'Backdoor' Circumvention of Bankruptcy Priority Scheme," *Journal of Corporate Renewal*, July/August 2017

## Activities and Affiliations

- International Women's Insolvency and Restructuring Confederation, Programming Chair
- American Bankruptcy Institute, Member

- State Bar of Georgia, Member
- Atlanta Bar Association, Member (Bankruptcy Section, Member)

## Community Involvement and Pro Bono

- Ethiopian Political Asylum Application, Pro Bono Volunteer, 20+ hours
- Atlanta Volunteer Lawyers Association, Pro Bono Volunteer, 200+ hours
- University of Virginia School of Law Pro Bono Challenge, 100+ hours
- Habitat for Humanity, Volunteer
- Street Law, Past President for University of Virginia School of Law
- Legal Aid Society of the District of Columbia, Legal Intern
- Bossier City Youth Soccer, Girls Soccer Coach
- Toys for Tots, Volunteer
- American Cancer Society Relay for Life, Volunteer
- Samaritan's Purse Operation Christmas Child, Volunteer
- Mission of Mercy, Volunteer to Honduras, Child Sponsor
- Omega Phi Alpha National Service Sorority, Member and Past Service Committee Co-chair

## Presentations

- Sarah presented her research and analysis on the Georgia Religious Freedom Restoration Act to The Anti-Defamation League during the 2015 Charles Wittenstein Summer Associate Research Program.

## Areas of focus

### Practices

- Commercial Litigation
- Insolvency Litigation and Enforcement
- Litigation and Dispute Resolution
- Restructuring, Insolvency and Bankruptcy
- Appellate Advocacy
- Distressed Assets
- Real Estate Litigation and Dispute Resolution

### Industry sectors

- Distressed Health Care
- Life Sciences and Health Care

- University of Virginia School of Law, 2016, JD
- Oklahoma State University, 2009, BS, Nutritional Sciences, *summa cum laude*

## Admissions and qualifications

- Georgia
- US Bankruptcy Court for the Northern District of Georgia
- US District Court for the Northern District of Georgia

# Adam Dondoyano

## Associate



Associate

Los Angeles

D +1 213 243 6104

[adam.dondoyano@dentons.com](mailto:adam.dondoyano@dentons.com)

## Overview

Adam is a member of Dentons' Corporate practice group. Adam focuses his practice on representing public and private companies in mergers, acquisitions, financings and general corporate matters.

Adam regularly advises domestic and global renewable and conventional energy companies, utilities, financial institutions and funds on transactions in the energy space, including mergers, acquisitions and project financing.

## Areas of focus

### Practices

- Corporate
- Corporate Governance
- Mergers and Acquisitions
- Venture Technology and Emerging Growth Companies

### Industry sectors

- Energy
- Renewable Energy

## Education

- UCLA School of Law, 2018, JD
- Florida State University, 2015, Bachelor of Science



# Admissions and qualifications

- California

# Exhibit C

**EXHIBIT C**

**SUMMARY OF TIME AND FEES BY DEBTOR AND BY TASK CODE**  
**INTERIM APPLICATION PERIOD: MAY - SEPTEMBER 4, 2020**

**1. Verity Health System of California, Inc. (Case No. 2:18-bk-20151-ER)**

<b>Task Codes</b>	<b>Categories</b>	<b>Hours</b>	<b>Fees</b>
APP	Appellate Proceedings	71.00	\$44,792.52
B100	Administration	31.30	\$15,670.98
B110	Case Administration	83.70	\$41,433.68
B120	Asset Analysis and Recovery	12.20	\$8,816.49
B130	Asset Disposition	102.30	\$60,589.90
B140	Relief from Stay/Adequate Protection	1.40	\$420.76
B150	Meetings of and Communications with Creditors	29.80	\$18,144.42
B160	Fee/Employment Applications (Less Fee Reduction-see below)	254.10	\$114,761.64
B170	Fee Objections/Employment Objections		
B180	Avoidance Action Analysis	264.20	\$190,883.24
B185	Assumption/Rejection of Leases and Contracts	20.50	\$7,811.09
B190	Other Contested Matters (excl. assumption/rejection motions)	29.10	\$13,201.62
B195	Non-Working Travel (Fee Reduction)		
B200	Operations	7.90	\$4,243.49
B210	Business Operations	3.90	\$2,827.46
B220	Employee Benefits/Pension	45.60	\$26,564.08
B230	Financing/Cash Collections	37.00	\$18,789.65
B240	Tax Issues	9.90	\$7,870.16
B250	Real Estate	17.00	\$6,179.23
B260	Board of Directors Matters	13.60	\$9,615.29
B300	Claims and Plan	439.20	\$246,592.83
B310	Claims Administration and	77.70	\$43,234.00

Task Codes	Categories	Hours	Fees
	Objections		
B320	Plan and Disclosure Statement	1505.00	\$893,700.50
B400	Bankruptcy-Related Advice	.30	\$80.33
B410	General Bankruptcy Advice/ Opinions		
EMP	Employee Matters	181.30	\$101,788.80
INS	Insurance	202.70	\$134,834.73
MED/DHCS	Medi-Cal/DHCS Issues	4.20	\$2,937.53
MED/CMS	Medicare/CMS Issues	1.40	\$617.53
REP	Reporting	1.60	\$752.10
<b>Sub-Total</b>		<b>3450.90</b>	<b>\$2,010,113.21</b>
<b>Fee Reductions<sup>1</sup></b>			<b>(\$238,784.00)</b>
<b>TOTAL</b>		<b>3450.90</b>	<b>\$1,771,329.21</b>

2. **O'Connor Hospital (Case No. 2:18-bk-20168-ER)**

Task Codes	Project Category	Hours	Fees
B130	Asset Disposition	1.30	\$784.55
B190	Other Contested Matters (excl. assumption/rejection motions)	10.70	\$4,879.06
B300	Claims and Plan	.50	\$281.36
MED/DHCS	Medi-Cal/DHCS Issues	2.70	\$2,160.00
<b>Total</b>		<b>15.20</b>	<b>\$8,104.97</b>

3. **St. Vincent Medical Center (Case No. 2:18-bk-20164-ER)**

Task Codes	Project Category	Hours	Fees
APP	Appellate Proceedings	.50	\$141.95
B130	Asset Disposition	2.60	\$1,446.35
B140	Relief from Stay/Adequate Protection	.10	\$59.93

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<sup>1</sup> Dentons eliminated fees incurred preparing Dentons' monthly statements totaling \$38,784.00, plus Dentons took an additional fee reduction of \$200,000.00 totaling \$238,784.00.

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B160	Fee/Employment Applications	.50	\$400.00
B185	Assumption/Rejection of Leases and Contracts	7.20	\$4,296.68
B190	Other Contested Matters (excl. assumption/rejection motions)	27.30	\$11,933.83
B210	Employee Benefits/Pension	.20	\$147.90
B220	Employee Pension & Profit Sharing Plans/Defined Benefit Plans/401k Plans (and any other retirement plans)	.50	\$400.00
B250	Real Estate	.60	\$277.30
B260	Board of Directors Matters		
B300	Claims and Plan	1.20	\$627.74
B310	Claims Administration and Objections	1.60	\$854.27
B320	Plan and Disclosure Statement	1.70	\$498.53
EMP	Employee Related Issues	10.70	\$5,532.70
MED/CMS	Medicare/CMS Issues	9.70	\$7,336.13
<b>TOTAL</b>		<b>64.40</b>	<b>\$33,953.31</b>

4. **St. Francis Medical Center (Case No. 2:18-bk-20165-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
AGI	Attorney General Issues	211.80	\$127,324.06
APP	Appellate Matters	76.40	\$41,077.97
B100	Administration	.90	\$720.00
B110	Case Administration	157.70	\$104,747.33
B130	Asset Disposition	351.60	\$193,004.53
B140	Relief from Stay/Adequate Protection	31.10	\$16,320.78
B150	Meetings of and Communications with Creditors (including Formation of the UCC; 341(a) Meeting; Committee calls)	.20	\$160.00
B185	Assumption/Rejection of Leases and Contracts	54.60	\$31,278.42

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B190	Other Contested Matters (excl. assumption/rejection motions)	118.40	\$58,850.64
B200	Operations	5.00	\$3,859.48
B210	Business Operations	.90	\$649.05
B220	Employee Benefits/Pension	.10	\$37.40
B240	Tax Issues	4.60	\$3,114.69
B250	Real Estate	47.30	\$12,664.60
B260	Board of Directors Matters	1.10	\$719.40
B300	Claims and Plan	9.30	\$4,983.83
B310	Claims Administration and Objections	11.90	\$6,694.69
B320	Plan and Disclosure Statement	2.30	\$749.29
EMP	Employee Matters	603.20	\$356,226.15
INS	Insurance Matters	.90	\$567.05
MED/DHC	Medi-Cal/DHCS Issues	29.20	\$20,819.19
MED/CMS	Medicare/CMS Issues	27.50	\$19,372.43
<b>TOTAL</b>		<b>502.80</b>	<b>\$305,489.15</b>

**5. Saint Louise Regional Hospital (Case No. 2:18-bk-20162-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B190	Other Contested Matters (excl. assumption/rejection motions)	.10	\$41.65
<b>TOTAL</b>		<b>.10</b>	<b>\$41.65</b>

**6. Seton Medical Center / Seton Coastside (Case No. 2:18-bk-20167-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
AGI	Attorney General Issues	21.50	\$13,216.16
B120	Asset Analysis and Recovery	1.30	\$779.03
B130	Asset Disposition	190.50	\$96,240.51
B140	Relief from Stay/Adequate Protection	.10	\$59.93

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B185	Assumption/Rejection of Leases and Contracts	55.90	\$22,955.11
B190	Other Contested Matters (excl. assumption/rejection motions)	17.20	\$8,126.52
B210	Business Operations	1.20	\$818.11
B220	Employee Pension & Profit Sharing Plans/Defined Benefit Plans/401k Plans	21.60	\$10,309.94
B300	Claims and Plan	.90	\$484.51
B310	Claims Administration/Objections	.30	\$75.23
B320	Plan and Disclosure Statement	.20	\$119.85
EMP	Employee related issues	231.10	\$140,750.46
INS	Insurance related issues	15.90	\$11,795.18
MED/CMS	Medicare/CMS Issues	5.20	\$3,069.55
MED/DHC	Medi-Cal/DHCS Issues	20.90	\$13,938.33
<b>TOTAL</b>		<b>590.50</b>	<b>\$325,741.42</b>

7. **Verity Business Services (Case No. 2:18-bk-20173-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B130	Asset Disposition	5.90	\$2,194.70
<b>TOTAL</b>		<b>5.90</b>	<b>\$2,194.70</b>

8. **Verity Medical Foundation (Case No. 2:18-bk-20169-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B130	Asset Disposition	13.70	\$8,970.49
B185	Assumption/Rejection of Leases and Contracts	1.90	\$1,377.00
B190	Other Contested Matters (excl. assumption/rejection motions)	9.50	\$4,578.16
B210	Business Operations	4.40	\$3,253.80

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B310	Claims Administration/Objections	1.90	\$1,211.25
<b>TOTAL</b>		<b>31.40</b>	<b>\$19,390.70</b>

9. **St. Vincent Dialysis Center, Inc. (Case No. 2:18-bk-20171-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B130	Asset Disposition	7.70	\$4,118.05
<b>TOTAL</b>		<b>7.70</b>	<b>\$4,118.05</b>

10. **Verity Holdings, LLC (Case No. 2:18-bk-20163-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B130	Asset Disposition	70.10	\$43,664.38
B185	Assumption/Rejection of Leases and Contracts	.40	\$100.30
B300	Claims and Plan	.20	\$160.00
B310	Claims Administration/Objections	1.60	\$989.49
<b>TOTAL</b>		<b>72.30</b>	<b>\$44,914.17</b>

11. **Verity Health v. SGM (Case No. 2:20-ap-01001-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
APP	Appellate Work	359.90	\$186,833.16
B100	Administration	3.80	\$1,440.77
B110	Case Administration	1.00	\$250.75
B130	Asset Disposition	625.60	\$375,293.90
B190	Other Contested Matters (excluding Assumption/Rejection Motions; First day Motions; Notices of Stay)	.40	\$100.30
B300	Claims and Plan	.30	\$179.78
<b>TOTAL</b>		<b>991.00</b>	<b>\$564,098.65</b>



**12. CNA v. Verity Health (Case No. 2:20-ap-01051-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B130	Asset Disposition	1.10	\$659.18
B190	Other Contested Matters (excluding Assumption/Rejection Motions; First day Motions; Notices of Stay)	501.00	\$300,326.18
EMP	Employee Related Issues	.50	\$250.75
<b>TOTAL</b>		<b>502.60</b>	<b>\$241,807.71</b>

**13. Seton Medical Center Foundation (Case No. 2:28-bk-20175-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
AGI	Attorney General Issues	.20	\$119.85
B130	Asset Disposition	.80	\$599.85
B190	Other Contested Matters (excluding Assumption/Rejection Motions; First day Motions; Notices of Stay)	.20	\$119.85
B320	Plan and Disclosure Statement	2.60	\$1,778.89
<b>TOTAL</b>		<b>3.80</b>	<b>\$2,618.44</b>

**14. St. Vincent Foundation (Case No. 2:18-bk-20180-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B190	Other Contested Matters (excl. assumption/rejection motions)	1.40	\$692.75
<b>TOTAL</b>		<b>1.40</b>	<b>\$692.75</b>

**15. DePaul Ventures, LLC (Case No. 2:28-bk-20176-ER)**

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
B130	Asset Disposition	3.70	\$1,250.35

<b>Task Codes</b>	<b>Project Category</b>	<b>Hours</b>	<b>Fees</b>
<b>TOTAL</b>		<b>3.70</b>	<b>\$1,250.35</b>

# Exhibit D

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Page 288 of 1878

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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293305**

Matter: 15800425-000003  
Verity Health System of California

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S. Maizel  
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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293305**


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For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000003  
Verity Health System of California

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/11/20	G. Medina	0.30	87.98	APP	Review at the request of C. Montgomery 9th Circuit Acknowledgment of Hearing Notice procedures.
05/11/20	D. Pina	1.00	318.75	APP	Communications with C. Montgomery regarding potential filings in 9th Circuit (.2); review rules and procedures regarding appearances and acknowledgment of hearing notice (.4); summarize protocol and required information and circulate with sample filing (.4).
05/11/20	C. Montgomery	5.30	4,240.00	APP	Attention to 9th Circuit acknowledgment certification and begin record review preparations for oral argument (1.8); communications with D Pina re same (.4); communications with T Moyron re same (.1); communications with P Ricotta regarding oral argument call (.1); begin review of UMB Brief structure and Committee Reply structure and cases (2.9)
05/12/20	T. Moyron	0.30	179.78	APP	Conference call with Mintz, et al. re appeal.
05/12/20	L. Macksoud	0.80	350.20	APP	Call with C. Montgomery re preparations for 9th circuit oral argument on DIP appeal.
05/12/20	D. Pina	1.00	318.75	APP	File Notice of Appearance and Acknowledgment of Hearing Notice in 9th Circuit Court for C. Montgomery.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	C. Montgomery	2.10	1,680.00	APP	Communications with L Macksoud regarding updated case review (.1); Phone call with L Macksoud regarding oral argument issues and update research questions (.8); continued preparations for oral argument (.5); phone call with P Ricotta, T Moyron, S Maizel regarding oral argument allocation (.5); follow up communications with D Pina regarding acknowledgment of hearing (.2)
05/12/20	N. Koffroth	0.50	250.75	APP	Participate in call with P. Ricotta, D. Bleck, et al. re oral argument issues
05/14/20	L. Macksoud	3.70	1,619.68	APP	Review case law in preparation for oral argument on 9th circuit appeal.
05/14/20	G. Medina	0.50	146.63	APP	Review 9th docket and pull appeal brief, the brief filed by the committee and UMB's papers and send to L. Macksoud per her request.
05/18/20	L. Macksoud	0.90	393.98	APP	Review committee brief and case law cited in preparation for 9th Circuit oral argument.
05/18/20	G. Medina	0.30	87.98	APP	File and send Notice of Intent to Mediate in the District Court and send efiled copy to team.
05/19/20	L. Macksoud	4.60	2,013.65	APP	Review UCC and UMB briefs and shephardize all cases cited, draft summary and analysis of any changes in law or commentary by other courts in preparation for 9th circuit oral argument.
05/19/20	C. Montgomery	2.00	1,600.00	APP	Communications with Ninth Circuit clerk's office regarding manner of appearance for June 2 argument, including app download (.6); communications with M Shinderman re argument (.1) ; communications with L Macksoud re selected 9th Circuit cases relevant to briefs and review same (.6); prepare argument question outline (.7)
05/20/20	K.M. Howard	0.30	75.23	APP	Reviewed and revised Critical Dates Memorandum regarding oral argument at Ninth Circuit in UCC v. Verity (.2); prepared email to team regarding telephonic oral argument (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	C. Montgomery	0.60	480.00	APP	Respond to inquiry from court of appeals regarding oral argument (.1); view oral argument live stream (.5)
05/21/20	C. Montgomery	0.60	480.00	APP	Review of Record (.1 ); participate in mandatory Ninth Circuit video training (.5)
05/28/20	C. Montgomery	4.60	3,680.00	APP	Resume preparations for oral argument (4.5); communications with L Macksoud re same (.1)
05/29/20	C. Montgomery	1.50	1,200.00	APP	Continued preparations for oral argument and focus on Judge Owens as panel member (1.4); communications with L Macksoud regarding Judge Amon decisions (.1)
05/29/20	K.M. Howard	0.80	200.60	APP	Reviewed Ninth Circuit Docket and culled key pleadings to assist counsel at oral argument (.7); prepared email to Verity Team regarding same (.1).
05/29/20	L. Macksoud	2.80	1,225.70	APP	Review all bankruptcy decisions of Judge Amon, draft summary and analysis of same in preparation for DIP appeal oral argument.
05/30/20	C. Montgomery	2.30	1,840.00	APP	Continued preparation for Oral Argument.
05/31/20	C. Montgomery	3.80	3,040.00	APP	Continued preparations for Ninth circuit oral argument.
05/31/20	K.M. Howard	0.20	50.15	APP	Reviewed email from L. Macksoud regarding telephonic 9th Circuit oral argument in UCC v. Verity (.1); assembled requested information and prepared responsive email regarding same (.1).
05/31/20	K.M. Howard	0.10	25.08	APP	Follow email exchange with L. Macksoud regarding the 9th Circuit Oral Argument.
<b>Subtotal</b>		<b>40.90</b>	<b>25,584.89</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
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June 28, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	M. Zeefe	1.40	672.35	B110	Collect and circulate key dates for upcoming week to core team.
05/05/20	T. Moyron	0.50	299.63	B110	Analyze emails from L. Woo and reply to same (.1); analyze release agreements and comments thereto (.4).
05/05/20	K.M. Howard	0.40	100.30	B110	Reviewed Critical Dates Memorandum to determine upcoming hearings and cross-referenced to the court's docketed hearings.
05/06/20	S. Maizel	1.00	800.00	B110	Telephone conference with T. Moyron re pending issues in case.
05/11/20	T. Moyron	0.30	179.78	B110	Analyze T. Conner and BRG emails re unclaimed funds (.2); prepare emails re same (.1).
05/11/20	M. Zeefe	0.50	240.13	B110	Review and circulate key dates for upcoming week to core team.
05/12/20	S. Maizel	0.80	640.00	B110	Telephone conference with R. Adcock, etc. re pending issues.
05/13/20	S. Maizel	1.50	1,200.00	B110	Telephone conference with Mintz Levin, Houlihan Lokey, etc. re plan and sale issues.
05/14/20	S. Maizel	1.30	1,040.00	B110	Telephone conference with BRG, C. Montgomery, etc. re various pending issues.
05/14/20	D. Pina	0.30	95.63	B110	Further update electronic case records and distribute copies of fully executed amended confidentiality agreements.
05/18/20	M. Zeefe	0.70	336.18	B110	Review and circulate key dates for upcoming week to core team.
05/19/20	S. Maizel	0.40	320.00	B110	Telephone conference with T. Moyron re pending issues.
05/20/20	T. Moyron	0.80	479.40	B110	Conference call with N. Koffroth re plan, deadlines, SGM, and other filings (.6); follow up call re same (.2).
05/20/20	N. Koffroth	0.80	401.20	B110	Participate in internal calls re case strategy re plan and deadlines related to sales and SGM litigation x2 (0.6) (0.2)



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/23/20	T. Moyron	0.70	419.48	B110	Analyze timeline and provide comments (.4); analyze pending matters and status (.3).
05/25/20	M. Zeefe	1.50	720.38	B110	Review and circulate week's key dates to core team.
05/26/20	K.M. Howard	0.70	175.53	B110	Reviewed and revised Master Critical Dates Memorandum (.6); email exchanges with T. Moyron regarding same (.1).
05/26/20	S. Maizel	0.50	400.00	B110	Telephone conference with R. Adcock, BRG, etc. re pending case matters.
05/27/20	K.M. Howard	0.40	100.30	B110	Reviewed and cross-referenced docketed dates to Critical Dates Memorandum to and reconcile same.
05/31/20	S. Maizel	0.50	400.00	B110	Email to T. Moyron re automatic stay vis-à-vis at will termination clauses.
<b>Subtotal</b>		<b>15.00</b>	<b>9,020.29</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/07/20	T. Moyron	0.60	359.55	B130	Conference call with 2005s re sales process.
05/07/20	S. Maizel	0.80	640.00	B130	Telephone conference with Mintz Levin, Houlihan Lokey, etc. re sale issues.
05/08/20	A. Dondoyano	0.40	129.20	B130	Confer with J.Moe and K.Murphy re the litigation schedules for SVMC, SFMC and Seton and review the updated litigation schedule for Seton.
05/12/20	T. Moyron	0.70	419.48	B130	Conference call with R. Adcock, Cain, BRG, et al. re sales and other updates on status.
05/13/20	S. Maizel	0.30	240.00	B130	Telephone conference with T. Moyron re sale issues.
05/14/20	A. Dondoyano	0.10	32.30	B130	Confer with client re closing checklist calls.
05/19/20	S. Maizel	0.20	160.00	B130	Emails re settlement proposals re provider agreements.
05/21/20	P. Maxcy	1.10	813.45	B130	Review proposed assignment document and forward to E. Paul for execution.
05/21/20	S. Maizel	1.40	1,120.00	B130	Telephone conference with Mintz Levin, Houlihan Lokey, etc. re plan issues, pending sales, etc.
05/26/20	T. Moyron	0.90	539.33	B130	Conference call with R. Adcock, BRG, Cain, et al. re sale matters and communications from Prospect (.5); conference call with R. Adcock re same (.3) and follow up call re same (.1).
<b>Subtotal</b>		<b>6.50</b>	<b>4,453.31</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/28/20	K.M. Howard	0.40	100.30	B140	Reviewed email from Norm Haslun regarding relief from stay orders (.1); reviewed docket to determine if relief from stay orders were entered in April 2020 (.2); prepared email to Norm Haslun regarding findings (.1).
	<b>Subtotal</b>	<b>0.40</b>	<b>100.30</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B150 - Meetings of and Communications with Creditors**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	S. Maizel	0.20	160.00	B150	Telephone conference with Smeeta Riishi re status of case.
05/11/20	S. Maizel	0.30	240.00	B150	Review and respond to emails re unclaimed funds letters from creditors.
05/12/20	S. Maizel	0.30	240.00	B150	Telephone conference with J. Kiley, BRG, re unclaimed funds issues.
<b>Subtotal</b>		<b>0.80</b>	<b>640.00</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B160 - Fee/Employment Applications**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	J.A. Moe, II	0.10	59.93	B160	/David Wright Tremaine/ Confirm Declaration and attachments filed on April 30th, in preparation for entry of Order approving employment of DWT.
05/04/20	J.A. Moe, II	0.20	119.85	B160	/Professionals Fifth Monthly Fee Applications/ Prepare draft of the Notice to Professionals on the dates of filing Fee Applications and date for hearing on Fee Applications.
05/04/20	K.M. Howard	0.50	125.38	B160	Reviewed and finalized BRG's Monthly Fee Application for March 2020 for filing (.2) and filed same (.2); assembled conformed document and prepared email to BRG regarding same (.1).
05/05/20	J.A. Moe, II	0.90	539.33	B160	/Dentons Fifth Monthly Fee Application/ Prepare first rough draft of Dentons Fifth Application For Fees And Reimbursements Of Expenses For The Period January 1, 2020 Through April 30, 2020, including commencing work on the Category Of Services performed during the Fifth Interim Period.
05/06/20	K.M. Howard	0.30	75.23	B160	Reviewed Notice to Professionals of Scheduled Date for Interim Fee Applications (.2); telephone conference with J. Moe regarding same (.1).
05/06/20	K.M. Howard	0.30	75.23	B160	Email exchange with S. Maizel regarding Dentons' February Fee Application (.1); reviewed same and culled requested information (.1); prepared email to Ann Bruscella regarding same (.1).
05/06/20	K.M. Howard	0.50	125.38	B160	Reviewed email from J. Moe and K. Smith regarding Dentons' billing statements for April (.1); briefly reviewed attached billing statements (.4).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	J.A. Moe, II	0.50	299.63	B160	/Dentons April Monthly Fee Application/ Review status on completing first print of the Statements, and exchange E-Mails with Katherine Smith on completion of first print of the Statements (10); preliminarily review (on line) Statements, including on multiple Submatters 3, 4, 5, 6, 8, 10, 14, 19, 20, 21 and the Expense Statement (.40).
05/06/20	J.A. Moe, II	0.10	59.93	B160	/Dentons Fifth Interim Fee Application/ Prepare first draft of Declaration in support of the Fee Application.
05/06/20	J.A. Moe, II	0.10	59.93	B160	/Fifth Interim Fee Applications/ Review the proposed Notice on setting hearing on Fee Applications, and confer with Kathryn Howard on contents of the Notice and setting dates.
05/07/20	J.A. Moe, II	0.60	359.55	B160	/Dentons Fifth Monthly Fee Application/ Complete review and editing the first rough draft of the Fifth Interim Application For Fees And Reimbursement Of Expenses For The Period January 1, 2020 Through April 30, 2020 (.30); prepare first draft of Assignment Memorandum on descriptions of work for the Fifth Interim Application (.30).
05/07/20	K.M. Howard	3.30	827.48	B160	Analysis of Dentons' March Billing Statements for privilege information.
05/08/20	J.A. Moe, II	0.20	119.85	B160	Davis Wright Tremaine/ Telephone call with Nara Neves on procedures for Fee Applications, including review of Application on procedures, Exhibit "A" to that Application and a review of Dentons February Fee Application.
05/08/20	J.A. Moe, II	2.40	1,438.20	B160	/Dentons April Monthly Fee Application/ Commence review and first set of revisions to Statements, revising Statements on Submatters Nos. 4, 14, 10 and 19 (.60); Submatter No. 8 (.60); and Submatter No. 6 (1.20), all in accordance with the U.S Trustee Guidelines.
05/08/20	K.M. Howard	0.50	125.38	B160	Analysis of Dentons' April billing statements to bring into compliance with U.S. Trustee Guidelines.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/11/20	K.M. Howard	0.10	25.08	B160	Reviewed email regarding the next Interim Fee Application.
05/11/20	K.M. Howard	3.90	977.93	B160	Analysis of Dentons' April 2020 billing statements to bring into compliance with US Trustee Guidelines and revised same.
05/11/20	T. Moyron	0.20	119.85	B160	Analyze matters related to fee app.
05/11/20	J.A. Moe, II	0.30	179.78	B160	/Dentons Fifth Interim Fee Application/ Revise and update draft of the Memorandum identifying work to be described in the Fee Application (.20); review and further update the Memorandum (.10).
05/11/20	J.A. Moe, II	4.40	2,636.70	B160	/Dentons April Monthly Fee Application/ Continue to review and revise the first draft of the April Statements, including Statements on Submatter No 20 (.70); Submatter No. 5 (.90); and Submatter No . 3 including annotating more than 30 sets of individual entries for corrections, e-mails to and telephone calls from five attorneys on corrections (2.80), all in compliance with the U.S. Trustee Guidelines.
05/11/20	J.A. Moe, II	0.10	59.93	B160	/Fifth Interim Fee Applications/ Review the revised Notice on Fee Applications, check the Court's Docket, and E-Mail to Sam Maizel and Tania Moyron for approval.
05/12/20	K.M. Howard	0.10	25.08	B160	Telephone conference with J. Moe regarding March billing statements.
05/12/20	K.M. Howard	4.90	1,228.68	B160	Analysis of Dentons' billing statements for March 2020 for all Debtors to bring into compliance with US Trustee Guidelines and revised same.
05/12/20	J.A. Moe, II	0.80	479.40	B160	/Dentons' April Monthly Fee Application/ In regard to the review and revisions to Statements done on May 8th and 11th, assemble and mark Statements for revisions (.60); telephone call with Kathryn Howard on revisions to time, reviewing amounts billed in each description (where applicable) (.10). telephone call to Kathryn Howard on completing review of calculations of time (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	J.A. Moe, II	1.10	659.18	B160	/Dentons Fifth Interim Fee Application/ Review and modify the Memorandum identifying work performed between January and April for inclusion in the Fee Application (.20); revise the formatted draft of Dentons Fifth Interim Fee Application to include categories of work performed, and revising the descriptive headings where descriptions of services shall be inserted (.90).
05/13/20	K.M. Howard	0.20	50.15	B160	Telephone conferences and email exchanges with J. Moe regarding revisions to Dentons' billing statements.
05/13/20	K.M. Howard	0.60	150.45	B160	Analysis of email from A. Bruscella regarding allocation of Debtors' payment (.1); further analysis of Dentons' January and February fee applications and billing statements (.3); followup email exchanges with A. Bruscella regarding proper allocations and the fee reductions (.2).
05/13/20	J.A. Moe, II	0.40	239.70	B160	/Dentons' April Monthly Fee Application/ Review Kathryn Howard's revisions to time billed by Professionals consistent with each Attorney's descriptions, and transmit for completion.
05/13/20	J.A. Moe, II	0.20	119.85	B160	/Dentons' May Monthly Fee Application/ In regard to the descriptions of services in the Fee Application, review Notice ("Hearing Set") and Order Approving Third Omnibus Stipulation, continuing the hearing on Objections to the proposed cure amounts on the assumption and assignment of contracts relating to St. Francis Medical Center.
05/14/20	J.A. Moe, II	0.80	479.40	B160	/Dentons Fifth Interim Monthly Fee Application/ Review and revise the formatted Fifth Interim Application.
05/15/20	J.A. Moe, II	0.20	119.85	B160	/BZBM/ Telephone call from Elina Tilman on status of and how payments are delivered to Counsel for the Debtors, drafting explanation with Ms. Tilman for delivery to the Carrier.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/15/20	J.A. Moe, II	0.90	539.33	B160	/Dentons Fifth Interim Fee Application/ Review and further revise the latest draft of the Fee Application (.60); correct Memorandum on tasks performed by Dentons and E-Mail to Tania Moyron transmitting the Memorandum (.30).
05/15/20	J.A. Moe, II	0.90	539.33	B160	/Dentons April Monthly Fee Application/ Review and annotate revisions to the April Statements.
05/19/20	K.M. Howard	0.10	25.08	B160	Prepared email to T. Moyron regarding the March 2020 monthly fee application.
05/19/20	J.A. Moe, II	0.40	239.70	B160	/Dentons April Monthly Fee Application/ Review and confirm receipt of three of four sets of corrections to time billed, and E-Mail to Eitan Kagedan on completing fourth set of revisions (30); obtain, review and forward Mr. Kagedan's revisions (.10).
05/19/20	J.A. Moe, II	0.40	239.70	B160	/Dentons' April Monthly Fee Application/ Review each of the revised Statements on time and descriptions of services from Dentons' Attorneys (Attorneys Hsu, Libowsky, Kagedan and Everly).
05/21/20	J.A. Moe, II	2.40	1,438.20	B160	/Dentons April Monthly Fee Application/ Commence review of first set of revisions to Statements, reviewing and revising Statements on Submatter Nos. 4, 10, 19, 20 and 21, and the Expense Statement (.70); review first set of revisions to Statements, reviewing and revising Statements on Submatters Nos. 8 (.50), 5 (.70) and commence revisions on Statements on Submatter No. 6 (.50).
05/22/20	J.A. Moe, II	2.70	1,617.98	B160	/Dentons April Monthly Fee Application/ Continue to review the first set of revisions, and review and include further revisions to the Statements on Submatter No. 5 (70); review first set of revisions, and further revisions, to the Statements on Submatter No. 3 (1.70); assemble second set of revisions to all Statements for submission (.30).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	J.A. Moe, II	0.70	419.48	B160	/BZBM/ Telephone call returned to Kerry Duffy on the status of the Notice, payment on fees and expenses, and procedures on payment of Interim Fees (.10); telephone call to Kathryn Howard on Notice (.10); additional telephone call with Ms. Howard on Notice and BZBM (.10); telephone call to Elina Tilman and identify Fee Application (.20); return call to Ms. Howard confirming that the BZBM Fee Application was filed (.10); return telephone call to Ms. Tilman on discrepancy (.10).
05/22/20	J.A. Moe, II	0.20	119.85	B160	/Dentons' March Monthly Fee Application/ Confer with Kathryn Howard on status of the filing of the March Fee Application.
05/22/20	K.M. Howard	3.60	902.70	B160	Conference with T. Moyron regarding March fee application regarding privileged entries (.4); reviewed and redacted privileged entries from Dentons' March billing statements (.7); reviewed and revised Dentons Monthly Fee Application for March 2020 (.4); finalized fee application and exhibits thereto and filed same (.5); reviewed monthly fee applications filed by Dentons, BRG, Pachulski, Bartko, Nelson Hardiman, Milbank Tweed, FTI Consulting, Levene Neale, PCO, Consultant Tim Stacy and culled key information for inclusion into Notice of Professionals' Monthly Fee Applications (.8); prepared Notice of Monthly Fee Applications for all Professionals paid by Debtors (.6); finalized and filed Notice of Monthly Fee Applications (.2).
05/22/20	K.M. Howard	0.30	75.23	B160	Reviewed docket regarding March fee application filed by Debtors' labor counsel (.2); telephone conference with J. Moe regarding same (.1).
05/22/20	T. Moyron	0.50	299.63	B160	Analyze and prepare fee application (.3); exchange emails regarding same (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	J.A. Moe, II	0.10	59.93	B160	/Notice Of Monthly Fee Applications/ Review Notice of Monthly Fee Applications, with the inclusion of requests for payment from multiple Professionals, including the Bartko Firm.
05/26/20	J.A. Moe, II	0.10	59.93	B160	/Dentons April Monthly Fee Application/ Confer with Katherine Smith on completing the Monthly Fee Application likely by May 27th.
05/27/20	J.A. Moe, II	0.20	119.85	B160	/Dentons April Monthly Fee Application/ Calculate fees incurred in conforming the Application to the U.S. Trustee Guidelines (.20); review status of and E-Mail on completing the April Statements.
05/28/20	K.M. Howard	3.50	877.63	B160	Email exchange with J. Moe regarding billing statements (.1); analysis of Dentons' April billing statements and prepared summary of hours and fees for Dentons' timekeepers (1.4); prepared summary of time, fees and expenses by Debtor (.9); reviewed billing statements for privilege (1.1).
05/28/20	J.A. Moe, II	0.20	119.85	B160	/Davis Wright Tremaine/ Review Nara Nieves' E-Mail and return E-Mail on conferring, then telephone call with Nara Nieves on filing and service of the Application.
05/28/20	J.A. Moe, II	1.50	898.88	B160	/Dentons April Monthly Fee Application/ Receive and preliminarily review, then arrange for transmittal of April Statements (.20); review the revised second version of the Statements (1.30).
05/29/20	K.M. Howard	1.10	275.83	B160	Reviewed underlying summaries of time, expenses and fees by Debtor and prepared Dentons' Monthly Fee Application for April 2020.
05/29/20	K.M. Howard	0.20	50.15	B160	Reviewed email from J. Moe regarding Bartko's monthly fee application (.1); telephone conference with J. Moe regarding same (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	J.A. Moe, II	0.30	179.78	B160	/BZBM/ Telephone call with Kerry Duffy, then Kathryn Howard, then to Ms. Duffy, confirming procedures for filing and service of Fee Applications (.20); review the Monthly Fee Application and suggest one revision to Ms.Duffy (.10).
05/29/20	J.A. Moe, II	0.60	359.55	B160	/Dentons April Monthly Fee Application/ Review and check revisions to Submatter Nos. 3 and 5.
<b>Subtotal</b>		<b>49.70</b>	<b>21,418.88</b>		
<b>Less Discount to Client</b>			<b>(9,465.00)</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B180 - Avoidance Action Analysis**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	T. Moyron	0.10	59.93	B180	Conference call with D. Galfus re preferences
05/26/20	T. Moyron	0.20	119.85	B180	Correspond with BRG re ASK and preferences.
05/28/20	C. Montgomery	0.10	80.00	B180	Communications with T Moyron and M Shinderman regarding preference analysis.
	<b>Subtotal</b>	<b>0.40</b>	<b>259.78</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	T. Moyron	0.30	179.78	B185	Analyze matters related to Nant equipment buy out and documents (.3)
05/05/20	T. Moyron	0.60	359.55	B185	Calls with N. Koffroth re cure issues re St. Francis and Seton (.4); analyze emails from counterparties re continuance (.2).
05/29/20	J.A. Moe, II	0.70	419.48	B185	/Picis and Quadramed/ Telephone call returned to Skuyler Carroll, reviewing the Notices to Counterparties, and the Exhibits, and status of the Picis and Quadramed Contracts (.40); E-Mail to, then telephone call to Peter Chadwick on contracts (.20); telephone call returned to Mr. Carroll on contracts and contacting Mr. Chadwick (.10).
<b>Subtotal</b>		<b>1.60</b>	<b>958.81</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	J.A. Moe, II	0.30	179.78	B190	/Master Calendar/ Review with Karleen Murphy the current Charts on all pending and threatened claims, and issues raised by Clerk on docketing the cases.
05/01/20	K. Murphy	0.30	124.95	B190	Confer with John Moe re Verity Chart for Superior Court cases.
05/01/20	K. Murphy	0.10	41.65	B190	/Vasquez/ Analyze CT Corporation notice of medical records subpoena for Rose Vasquez and download/review the same to prepare for drafting email to Karen Chapman re the same.
05/05/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena / Analyze email from Elina Tilman to Nam Nguyen re general question on procedure for acknowledging notices received from CT Corp and analyze Nam Nguyen's response to the same to ensure following of proper procedure.
05/06/20	J.A. Moe, II	0.20	119.85	B190	/John Phi v. St. Vincent/ Review proposed Case Management Conference Statement, and E-Mail to Karleen Murphy on proposed additional language (.10); brief conferences with Karleen Murphy on necessity to update Statement with reference to the Orders entered on sales (.10).
05/08/20	K. Murphy	0.10	41.65	B190	/ Lara/Johns / Analyze and respond to email from John Moe re upcoming Non Appearance Case Review.
05/18/20	K. Murphy	0.10	41.65	B190	/ Sanford / Draft email to Laurie Soledad to confirm cancellation of court call due to matter continuation on court's own motion.
05/18/20	K.M. Howard	0.20	50.15	B190	Analysis of AIG's reservation of rights in Dahl v. Verity.
05/19/20	K. Murphy	0.10	41.65	B190	/ Lara/Johns / Analyze LA Superior Court website to determine status of 5/22/20 Non Appearance Case Review.
05/20/20	K. Murphy	0.10	41.65	B190	/ Lara/Johns / Analyze and respond to email from Sam Park at Alston & Bird enclosing Plaintiffs' Report for Non-Appearance Case Review, and analyze report.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	K. Murphy	0.10	41.65	B190	/ Lara/Johns / Analyze and respond to email from John Moe re case status.
05/20/20	J.A. Moe, II	0.10	59.93	B190	/Lara - Liera, Johns v. Verity/ Review Opposing Counsel's Case Management Conference Statement.
05/21/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Joyce Al-Islam / Telephone call to Plaintiff's counsel to verify facility at issue for medical records subpoena to respond to email from Karen Chapman inquiring of the same.
05/21/20	K. Murphy	0.10	41.65	B190	/ Lara/Johns / Analyze and respond to email from John Moe re Non Appearance Case Review.
05/21/20	K. Murphy	0.50	208.25	B190	/ CT Corp Subpoena / Telephone call with Elina Tilman re discussion of protocol for handling CT Corp subpoenas for medical and employment records.
05/21/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Leroy Scott / Analyze CT Corp notice of employment subpoena and draft email to Elina Tillman re the same.
05/21/20	J.A. Moe, II	0.10	59.93	B190	/Bay Area Surgical/ Review Subpoena for Records, directed to Verity Health System, in behalf of Joyce Al-Islam.
05/22/20	J.A. Moe, II	0.10	59.93	B190	/Lara, Liera/ Johns - Data Breach Cases/ Review detailed Minute Order with requirement for Joint Statement, and telephone call with Karleen Murphy on effectuating the requirements of the Order.
05/22/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Joyce Al-Islam / Further telephone call to Plaintiff's counsel to verify facility at issue for medical records and draft email to Karen Chapman and Steve Sharrer confirming the location as Bay Area Surgical.
05/22/20	K. Murphy	0.20	83.30	B190	/ Lara/Johns / Analyze email from Alston & Bird enclosing court's 5/22/20 Minute Order continuing Non-Appearance Case Review re BK and respond to the same (.1); analyze order and draft update to Verity Litigation Management Chart Deadline with new date (.1).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	K. Murphy	0.20	83.30	B190	Analyzed email from Elina Tilman enclosing AIG Loss Run and analyzed the same (.1); and draft email response to Ms. Tilman re the same. (.1).
05/25/20	S. Maizel	1.00	800.00	B190	Revising motion re SCFHP offset.
05/26/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena / Telephone call with John Moe re notifications re subpoenas for medical and employment records.
05/26/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Sanford / Analyze email notice from CT Corp re documents served in matter and confer with Elina Tilman re Ms. Tilman's handling of the same.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Rose Vasquez v. Embassy Suites/ Review Subpoena for records directed to Verity and E-Mail to Karleen Murphy on Subpoenas.
05/26/20	J.A. Moe, II	0.20	119.85	B190	/Subpoenas/ Review with Karleen Murphy responding to current and future Subpoenas.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Review newly served Complaint filed by Mesha Sanford against St. Francis, and E-Mail from Elina Tilman on likely dismissal of two causes of action.
05/26/20	K. Murphy	0.10	41.65	B190	/ Sanford / Analyze email from Elina Tilman enclosing Summons and Complaint to Verity Litigation Management Charts re the same (.1).
05/26/20	K. Murphy	0.10	41.65	B190	/ CNA / Analyze email from Karen Chapman with AIG letter dated 5/27/2020 re establishment of claim and draft update to Verity Litigation Management Chart with claim information.
05/26/20	K. Murphy	0.10	41.65	B190	/ Sanford / Analyze notice from CT Corporation re Summons and Complaint and confer with Elina Tilman re Ms. Tilman distribution of the same to Verity Team.
<b>Subtotal</b>		<b>5.30</b>	<b>2,777.13</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B200 - Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	B. Greer	1.70	1,360.00	B200	Review Carefusion contract; teleconference with BRG re: same.
05/21/20	B. Greer	0.50	400.00	B200	Emails and teleconference re: CareFusion contract review.
	<b>Subtotal</b>	<b>2.20</b>	<b>1,760.00</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B230 - Financing/Cash Collections**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	L. Macksoud	1.10	481.53	B230	Draft NDA extensions and draft emails to all counsel re same.
05/01/20	K.M. Howard	0.40	100.30	B230	Analysis of Final Order Approving Stipulation to Amend the Third Amended Supplemental Cash Collateral Order and reviewed and revised Critical Dates Memorandum accordingly.
05/01/20	S. Alberts	0.40	320.00	B230	VHS Cash collateral. Communications about RPHE pension obligation issue (.2) and follow up (.2).
05/01/20	T. Moyron	1.30	779.03	B230	Analyze email from J. Schlant (.1); analyze updated budget (.2); exchange emails with J. Schlant (.2) and call (.1); call with P. Chadwick (.1); prepare email to Committee counsel and analyze response (.1); analyze matters related to RPHE payment and calculations (.3) and prepare emails re same (.2).
05/01/20	N. Koffroth	5.70	2,858.55	B230	Draft Fourth Amended Supplemental Cash Collateral Order and related stipulation
05/01/20	C. Montgomery	0.80	640.00	B230	Communications with L Macksoud regarding lender NDA's (.1); final review of cash collateral order and stipulation (.3) ; communications with N Koffroth and T Moyron re budget update (.1); communications with T Moyron and S Alberts regarding RPHE contributions for next budget period (.3)
05/06/20	L. Macksoud	0.20	87.55	B230	Confer with bank counsel re NDA amendments
05/11/20	L. Macksoud	0.20	87.55	B230	Finalize NDAs and circulate executed copies to landers.
05/13/20	D. Pina	0.60	191.25	B230	Review agreements received from L. Macksoud and update electronic case records with 14th amended confidentiality agreements with Wells Fargo, UMB Bank and US Bank.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	C. Montgomery	2.10	1,680.00	B230	Prepare for and participate in cash collateral sources call with D Galfus and J Schlant (1.4); review post call follow up illustration from J Schlant (.5); communications with J Schlant regarding revised illustration (.1); communications with T Moyron re same (.1)
05/19/20	K.M. Howard	0.40	100.30	B230	Analysis of the Stipulation between UCC and Verity MOB Financing, LLC extending Challenge Deadline and reviewed Critical Dates Memorandum accordingly.
05/19/20	K.M. Howard	0.40	100.30	B230	Analysis of the Stipulation between UCC and Verity MOB Financing II, LLC extending Challenge Deadline and reviewed Critical Dates Memorandum accordingly.
05/20/20	K.M. Howard	0.40	100.30	B230	Analysis of Order approving Stipulation to extend the Challenge Deadline among Verity MOB Financing II, Verity MOB Financing, LLC and UCC and reviewed and revised Critical Dates Memorandum accordingly.
05/27/20	C. Montgomery	0.10	80.00	B230	Review stipulations extended Committee challenge periods for MOB claims.
<b>Subtotal</b>		<b>14.10</b>	<b>7,606.66</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B260 - Board of Directors Matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/14/20	C. Montgomery	1.80	1,440.00	B260	Review and comment upon Board presentation.
05/14/20	S. Maizel	0.40	320.00	B260	Review and revise "slide deck" for board meeting.
05/14/20	T. Moyron	1.60	958.80	B260	Analyze and prepare board slides (1.2); analyze and prepare emails regarding same with C. Montgomery, P. Chadwick, et al. (.4).
05/15/20	T. Moyron	2.50	1,498.13	B260	Attend Board Meeting.
05/15/20	S. Maizel	2.70	2,160.00	B260	Telephone conference with VHS Board re pending issues.
	<b>Subtotal</b>	<b>9.00</b>	<b>6,376.93</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	S. Maizel	0.10	80.00	B300	Telephone conference with Rob Hirsh re Medline 503(b)(9) claims.
05/06/20	S. Maizel	0.10	80.00	B300	Review and respond to email re Sharp Electronics claims.
05/07/20	S. Maizel	0.10	80.00	B300	Telephone conference with Rob Hirsch re Medline 503(b)(9) claim.
05/13/20	S. Maizel	0.20	160.00	B300	Telephone conference with Rob Hirsh re Medline 503(b)(9) claim.
05/20/20	K.M. Howard	0.40	100.30	B300	Analysis of Medline's Motion to Compel Payment of Administrative Claim and Notice of Hearing and reviewed and revised Critical Dates Memorandum regarding same.
05/20/20	T. Moyron	0.60	359.55	B300	Analyze Medline objection (.3); conference call with D. Galfus re same and related matters (.3).
05/20/20	S. Maizel	0.10	80.00	B300	Review and respond to emails re Boston Scientific's 503(b)(9) claims.
05/20/20	S. Maizel	0.20	160.00	B300	Review and respond to Medline motion re its 503(b)(9) claims.
05/21/20	K.M. Howard	0.20	50.15	B300	Analysis of the Court's notice setting Medline's Motion to Compel Payment of Administrative Claim and reconciled same to Critical Dates Memorandum.
05/21/20	C. Doherty, Jr.	4.30	1,608.20	B300	Research Issues Regarding Payment of Secured Claims re Discussions with Lenders (3.3); prepare memo re same (1.0)
05/21/20	J.A. Moe, II	1.30	779.03	B300	Preliminarily review Motion filed by Medline seeking payment of an Administrative Claim (or forestalling payment of Professional Fees) (.10); review the Motion and attached Agreement on payment of Administrative Claim (.30); research issue of timing on payment of an Administrative Claim (.90).
05/22/20	L. Macksoud	0.40	175.10	B300	Emails with C. Doherty and T. Moyron re liquidating trust research

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/23/20	T. Moyron	0.40	239.70	B300	Analyze Medline Motion and 9019 motion and order.
05/23/20	B. Greer	1.80	1,440.00	B300	Review Medline motion, research re same, teleconferences and emails re same.
05/24/20	B. Greer	5.10	4,080.00	B300	Prepare Medline opposition, research re: same.
05/25/20	B. Greer	6.20	4,960.00	B300	Review and revise opposition re Medline (4.0); emails re same (.4); research re same ( 1.8).
05/26/20	S. Maizel	0.40	320.00	B300	Telephone conference with Brian Greer, etc. re Medline request re admin expense.
05/26/20	S. Maizel	0.80	640.00	B300	Review and revise opposition to Medline request re admin expense.
05/26/20	C. Montgomery	0.10	80.00	B300	Phone call with D. Galfus regarding draft response to Medline and role of plan timing in the response.
05/26/20	N. Koffroth	0.90	451.35	B300	Participate in internal call re Medline motion re payment of administrative claim (0.4); draft opposition re Medline motion (0.5)
05/26/20	B. Greer	4.70	3,760.00	B300	Teleconference re Medline opposition (.8); review and revise same, research re same (3.9).
05/26/20	T. Moyron	0.90	539.33	B300	Analyze emails from BRG re Medline (.2); analyze comments and updated motion (.3); conference call with B. Greer (.4).
05/27/20	B. Greer	6.20	4,960.00	B300	Review and revise opposition re Medline (3.8); emails re same (.4); research re same (2.0).
05/27/20	S. Maizel	0.10	80.00	B300	Review and revise opposition to Medline motion re admin expenses.
05/27/20	T. Moyron	0.60	359.55	B300	Analyze final version of opposition re Medline (.3); exchange emails with P. Chadwick, et al. (.3).
05/27/20	J.A. Moe, II	0.10	59.93	B300	Review Debtors' Opposition To Medline Industries' Motion To Compel Payment Of Administrative Claim, Or In The Alternative, To Disallow Further Payment Of Professional Fees.
05/27/20	N. Koffroth	0.90	451.35	B300	Draft opposition to Medline motion re payment of administrative claims

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
	<b>Subtotal</b>	<b>37.20</b>	<b>26,133.54</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	P. Maxcy	0.20	147.90	B310	Discuss Cardinal proposal with J. Emerson.
05/05/20	P. Maxcy	0.40	295.80	B310	Review information in Cardinal claim and follow up with J. Emerson.
05/15/20	K.M. Howard	0.20	50.15	B310	Analysis of UNACS Withdrawal of Specific Allegations in Proof of Claim.
05/21/20	P. Maxcy	1.10	813.45	B310	Comment on proposed Cardinal settlement and discuss same with Verity legal team and BRG.
05/22/20	P. Maxcy	0.40	295.80	B310	Review reconciliation of Cardinal claims and emails with Verity legal team and BRG on next steps.
05/29/20	J.A. Moe, II	0.20	119.85	B310	/Van De Poel Law Firm/ Telephone call returned to Katherine O'Connell, reviewing status of the bankruptcy proceedings, in regard to payment on Claims.
<b>Subtotal</b>		<b>2.50</b>	<b>1,722.95</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	T. Moyron	1.30	779.03	B320	Analyze matters related to plan of liquidation.
05/05/20	T. Moyron	0.20	119.85	B320	Coordinate matters related to disclosure statement.
05/05/20	N. Koffroth	5.80	2,908.70	B320	Draft amended plan of liquidation
05/05/20	M. Zeefe	0.10	48.03	B320	Emails re updating disclosure statement.
05/06/20	N. Koffroth	3.20	1,604.80	B320	Draft amended plan of liquidation
05/06/20	T. Moyron	1.30	779.03	B320	Analyze matters related to plan (.8); correspond with BRG re call (.2); analyze matters related to Disclosure Statement (.3).
05/07/20	N. Koffroth	1.60	802.40	B320	Participate in call with D. Galfus, P. Chadwick, et al. re plan of liquidation
05/07/20	N. Koffroth	6.70	3,360.05	B320	Draft amended plan of liquidation
05/07/20	C. Montgomery	1.80	1,440.00	B320	Communications with N Koffroth re Agenda for plan (.1) communications with J Schlant re Update plan Numbers (.1); participate in conference call with T Moyron, S Maizel, N Koffroth, D Galfus, J Schlant re Plan recoveries ( 1.6).
05/07/20	S. Maizel	1.60	1,280.00	B320	Telephone conference with BRG, etc. re plan issues.
05/07/20	T. Moyron	2.10	1,258.43	B320	Conference call with BRG, et al. re Plan matters (1.5); analyze updated analysis (.2); analyze Plan matters (.4).
05/07/20	M. Zeefe	2.90	1,392.73	B320	Update disclosure statement (2.8); call with T. Moyron re same (0.1).
05/08/20	M. Zeefe	1.50	720.38	B320	Continue updating disclosure statement.
05/08/20	N. Koffroth	8.30	4,162.45	B320	Draft amended plan of liquidation
05/09/20	N. Koffroth	2.30	1,153.45	B320	Internal call re plan of liquidation
05/09/20	N. Koffroth	1.90	952.85	B320	Draft amended plan of liquidation

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/09/20	C. Montgomery	2.80	2,240.00	B320	Phone conference with T Moyron, S Maizel and N Koffroth re changes to plan of liquidation (2.3); phone call with N Koffroth re avoidance claims at Holdings and continuing debtor list (.3); communications with T Moyron, S Maizel re same (.2)
05/09/20	S. Maizel	2.30	1,840.00	B320	Telephone conference with T. Moyron, etc. re plan revisions.
05/11/20	S. Maizel	0.50	400.00	B320	Telephone conference with R. Adcock, BRG, etc. re preparation of plan issues.
05/11/20	C. Montgomery	1.50	1,200.00	B320	Communications with T Moyron regarding plan changes (.4); phone call with D Galfus regarding Holding value allocation on Effective Date (.6); phone call with T Moyron, H Levy-Beihl regarding responsible officer and liquidating trustee issues (.5)
05/11/20	N. Koffroth	0.50	250.75	B320	Participate in call with R. Adcock, H. Levy-Biehl, et al. re plan of liquidation
05/11/20	N. Koffroth	6.90	3,460.35	B320	Draft plan of liquidation
05/11/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan issues.
05/11/20	T. Moyron	3.30	1,977.53	B320	Analyze plan and matters related thereto (2.5); prepare email to H. Levy-Biel re RO inquiry (.1); prepare email to BRG re plan (.1); analyze email from D. Galfus (.1); conference call with R. Adcock, et al. re RO and LT (.5).
05/11/20	T. Moyron	0.20	119.85	B320	Exchange emails with C. Montgomery re appeal (.1); analyze Mintz emails re same (.1).
05/13/20	T. Moyron	2.70	1,617.98	B320	Conference call with advisors for 2005s, BRG, et al. re POL (1.3); follow up call with BRG, et al. re same (.7); exchange emails with client re POL discussion (.1); analyze related matters (.6).
05/13/20	C. Montgomery	2.10	1,680.00	B320	Review diminution of value issue in anticipation of Lenders Call (.3); participate in call with D Bleck, P Ricotta (1.3); follow up conference call with P Chadwick, D Galfus, TMoyron, S Maizel and N Koffroth re lender plan presentation issues (.5)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/13/20	M. Zeefe	0.70	336.18	B320	Revise disclosure statement.
05/13/20	S. Maizel	0.50	400.00	B320	Telephone conference with BRG re plan issues.
05/13/20	N. Koffroth	2.00	1,003.00	B320	Participate in call with counsel to secured lenders re plan of liquidation (1.3); participate in internal call re plan of liquidation (0.7)
05/14/20	N. Koffroth	1.10	551.65	B320	Participate in call with R. Adcock, P. Chadwick, et al. re plan of liquidation
05/14/20	N. Koffroth	1.20	601.80	B320	Participate in call with P. Chadwick, D. Galfus, et al. re recovery models
05/14/20	N. Koffroth	1.10	551.65	B320	Participate in internal calls re plan of liquidation x3 (0.6) (0.2) (0.3)
05/14/20	N. Koffroth	2.90	1,454.35	B320	Draft plan of liquidation
05/14/20	T. Moyron	3.90	2,337.08	B320	Call with N. Koffroth re plan matters (.6); and follow up call (.1); call with R. Adcock, H. Levy-Biehl, BRG, et al. re plan matters (1.1); analyze email from J. Schlant and attachment (.2); call with BRG, C. Montgomery, et al. re claims and plan (1.2); follow up call with S. Maizel (.1); analyze matters re plan (.6).
05/14/20	S. Maizel	1.00	800.00	B320	Telephone conference with R. Adcock, BRG, etc. re plan issues.
05/14/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re plan issues.
05/14/20	M. Zeefe	1.60	768.40	B320	Continue drafting disclosure statement.
05/14/20	C. Montgomery	2.80	2,240.00	B320	Phone conference with R Adcock, H Levy-Biehl, P Chadwick, D Galfus, S Maizel, T Moyron and N Koffroth (1.0); review MOB financing water fall (.1); review plan hurdle draft (.2); prepare for plan call re interest and diminution issues (.3); participate in phone conference regarding MOB treatment under plan with P Chadwick, D Galfus ,S Maizel, T Moyron and N Koffroth (1.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/15/20	C. Montgomery	4.80	3,840.00	B320	Communications with N Koffroth re estimation process (.1); attention to diminution claim and postpetition interest including research and review of illustrative model (2.9); phone call with J Schlant re MOB illustration (.1) ; participate in phone calls with S Maizel, N Koffroth and T Moyron regarding plan issues (1.4); communications N Koffroth regarding diminution claim (.2); communications with D Galfus regarding revised plan illustrations (.1)
05/15/20	S. Maizel	1.60	1,280.00	B320	Telephone conference with C. Montgomery, etc. re plan issues.
05/15/20	N. Koffroth	2.80	1,404.20	B320	Participate in internal calls re analysis of issues re plan of liquidation x4 (1.4) (0.9) (0.3) (0.2)
05/15/20	T. Moyron	1.90	1,138.58	B320	Conference call with C. Montgomery, et al. re Plan matters (1.1); analyze plan matters (.8).
05/15/20	T. Moyron	0.80	479.40	B320	Review analysis regarding MOBs (.2); analyze matters related to calculation of diminution claims (.6).
05/15/20	T. Moyron	0.30	179.78	B320	Conference call with P. Chadwick re Plan and Board Meeting.
05/15/20	N. Koffroth	1.70	852.55	B320	Draft plan of liquidation
05/18/20	M. Zeefe	0.10	48.03	B320	Correspondence with T. Moyron and N. Koffroth re disclosure statement.
05/18/20	T. Moyron	0.60	359.55	B320	Analyze matters related to updated disclosure statement and plan calculations.
05/19/20	T. Moyron	1.80	1,078.65	B320	Conference call with BRG, et al. re analysis and plan (1.4); calls with D. Bleck re plan (.4).
05/19/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan issues.
05/19/20	N. Koffroth	1.50	752.25	B320	Participate in call with D. Galfus, P. Chadwick, et al. re recovery models

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/19/20	C. Montgomery	1.70	1,360.00	B320	Phone call from D Galfus regarding PBGC settlement issues (.1); participate in phone conference with D Galfus, J Schlant, T Moyron and N Koffroth regarding plan settlement, diminution claims and adequate protection impact on secured claim recovery under proposed plan (1.5); follow up communications with N Koffroth re plan time line (.1)
05/19/20	M. Zeefe	5.80	2,785.45	B320	Continue drafting disclosure statement.
05/20/20	M. Zeefe	8.90	4,274.23	B320	Continue drafting disclosure statement.
05/20/20	N. Koffroth	0.30	150.45	B320	Participate in call with D. Galfus et al. re plan
05/20/20	T. Moyron	0.30	179.78	B320	Conference call with D. Galfus, et al. re plan matters.
05/21/20	S. Maizel	1.00	800.00	B320	Telephone conference with BRG, etc. re plan issues (.3); telephone conference with R. Adcock, etc. re plan issues (.7).
05/21/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan issues (.1); telephone conference with R. Adcock re same (.1).
05/21/20	S. Maizel	0.40	320.00	B320	Review and respond to emails re liquidating trust payment of post-confirmation interest.
05/21/20	T. Moyron	3.20	1,917.60	B320	Conference call with Mintz, HL, et al. re plan (1.3); conference call with R. Adcock, et al. re plan (.3); conference call with R. Adcock, BRG, et al. re plan (.7); analyze plan matters re interest (.7); exchange emails re same (.2).
05/21/20	T. Moyron	0.90	539.33	B320	Call with R. Adcock re SGM, plan matters, calendar and other matters (.4); follow up call regarding same (.5).
05/21/20	M. Zeefe	0.10	48.03	B320	Continue drafting disclosure statement.
05/21/20	N. Koffroth	1.00	501.50	B320	Participate in call with D. Galfus, P. Chadwick, et al. re plan and recovery models (0.7); participate in internal call re plan (0.3)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/20	C. Montgomery	5.10	4,080.00	B320	Participate in Lenders' call re plan issues (1.3); follow up call with T Adcock, P Chadwick, D Galfus, T Moyron, S Maizel, regarding plan issues (.7); research Lehman Plan for post effective date interest question and communications with T Moyron re same (1.0); phone call with C Douherty re post effective date interest issue (.7); review and comment on draft liquidation analysis (.3); review Medline 503(b)(90 payment demand (.1); review BRG updated recovery model and communications with S Maizel regarding post effective date interest (1.0)
05/22/20	C. Montgomery	2.60	2,080.00	B320	Phone call with S Alberts regarding prior PBGC settlement and possible impact on waterfall (.6); phone call D Galfus regarding plan Waterfall and PBGC issues ( .5); phone call T Moyron regarding plan waterfall changes and impact of PBGC and RPHE claims (.3); draft footnote language for waterfall and communications with D Galfus and T Moyron re same (.5); review plan structure question for possible 2L type structure for PBGC (.3); phone call with D Galfus and J Schlant regarding priority claim reserve category (.4)
05/22/20	M. Zeefe	5.80	2,785.45	B320	Continue drafting disclosure statement.
05/22/20	T. Moyron	0.80	479.40	B320	Analyze matters regarding hurdle analysis (.2); analyze various priority claims (.4); exchange emails regarding same (.2).
05/23/20	M. Zeefe	10.60	5,090.65	B320	Continue drafting disclosure statement and circulate.
05/23/20	T. Moyron	3.20	1,917.60	B320	Prepare plan of liquidation.
05/23/20	N. Koffroth	3.50	1,755.25	B320	Draft plan of liquidation
05/24/20	T. Moyron	2.80	1,677.90	B320	Prepare plan of liquidation.
05/24/20	N. Koffroth	2.80	1,404.20	B320	Draft plan of liquidation
05/25/20	T. Moyron	4.10	2,456.93	B320	Conference call with D. Galfus re plan (.2); conference call with H. Levy-Biehl re plan (.2); analyze updated redline re plan of liquidation (.4); prepare plan of liquidation (3.3).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/25/20	N. Koffroth	0.20	100.30	B320	Participate in call with H. Levy-Biehl and T. Moyron re plan
05/25/20	N. Koffroth	4.80	2,407.20	B320	Draft plan of liquidation
05/25/20	T. Moyron	2.30	1,378.28	B320	Prepare plan of liquidation.
05/25/20	M. Zeefe	0.10	48.03	B320	Email to T. Moyron and N. Koffroth re disclosure statement.
05/26/20	C. Montgomery	7.30	5,840.00	B320	Communications with N Koffroth regarding source of authority regarding adequate protection payments (.1); phone call with C Whitmore regarding plan timing (.1); review revised plan of liquidation and communications with T Moyron regarding comments regarding same (6.8); phone call with T Moyron regarding plan distribution timing (.1) ; review J Montali decision regarding insurance subrogation claims in confirmation dispute (.2)
05/26/20	N. Koffroth	7.20	3,610.80	B320	Draft plan of liquidation
05/26/20	S. Maizel	0.50	400.00	B320	Research re preservation of litigation rights in plan.
05/26/20	S. Maizel	0.80	640.00	B320	Review and comment on Plan of Liquidation draft.
05/26/20	T. Moyron	3.80	2,277.15	B320	Analyze updated redline of plan (.4); conference call with P. Ricotta re plan (.7); conference call with Mintz re plan (.5); analyze final version of BRG analysis and notes (.4); prepare comments to same and emails to J. Schlant (.2); correspond with M. Garms re same (.2); analyze final version of analysis (.1); coordinate circulation of same (.2); analyze comments to draft plan (.3); conference call with P. Chadwick re plan (.3) and follow up regarding same (.1); conference call with C. Montgomery re plan (.4).
05/26/20	T. Moyron	0.30	179.78	B320	Conference call with R. Adcock re plan.
05/26/20	T. Moyron	1.60	958.80	B320	Further prepare plan of liquidation.
05/27/20	T. Moyron	1.10	659.18	B320	Conference call with R. Adcock, BRG, H. Levy-Biehl, et al. re plan, timeline and other case matters.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/20	T. Moyron	1.10	659.18	B320	Analyze comments to plan and updated redlines (.4); analyze updated version of plan (.4); exchange emails with N. Coco, P. Ricotta re plan (.2); exchange emails with P. Saba re recovery analysis (.1).
05/27/20	S. Maizel	1.00	800.00	B320	Telephone conference with C. Montgomery, etc. re plan of liquidation issues.
05/27/20	S. Maizel	0.80	640.00	B320	Telephone conference with R. Adcock, etc. re plan issues.
05/27/20	M. Zeefe	1.80	864.45	B320	Revise disclosure statement to reflect plan revisions and recent filings.
05/27/20	C. Montgomery	2.40	1,920.00	B320	Communications with N Koffroth regarding plan update (.1); review updated draft (1.2); participate in phone conference with N Koffroth, T Moyron and S Maizel re same (.8); follow up communications with T Moyron re additional language issues (.2) ; communications with T Moyron, C Whitmore and P Ricotta regarding plan discussion meeting (.1)
05/27/20	N. Koffroth	0.70	351.05	B320	Participate in internal call re plan of liquidation
05/27/20	N. Koffroth	1.00	501.50	B320	Participate in call with R. Adcock, P. Chadwick, et al. re plan strategy issues
05/27/20	N. Koffroth	0.50	250.75	B320	Participate in call with R. Adcock, S. Sharrer, et al. re labor issues
05/28/20	C. Montgomery	0.10	80.00	B320	Phone call with T Moyron regarding tomorrow's committee call re waterfall and plan.
05/28/20	S. Maizel	0.30	240.00	B320	Review and respond to emails re plan and recovery hurdle analysis.
05/28/20	T. Moyron	0.30	179.78	B320	Exchange emails with lenders regarding plan call (.1); exchange emails with Committee regarding call (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	T. Moyron	3.80	2,277.15	B320	Analyze hurdle analysis and redline in connection with upcoming calls (.4); exchange emails with Mintz re plan (.1); analyze redline comments to plan (.6); Conference call with BRG, N. Koffroth, et al. re plan (.8); conference call with lenders (.4); conference call with Committee advisors, BRG, et al. (.7); conference call with BRG and Dentons (.3); call with Mintz (.3); call with S. Maizel re same (.2).
05/29/20	S. Maizel	1.80	1,440.00	B320	Telephone conference with T. Moyron re plan issues (4); telephone conference with C. Montgomery re same (.2); telephone conference with BRG, etc. re same (x2) (1.2) .
05/29/20	S. Maizel	1.20	960.00	B320	Telephone conference with secured creditors, etc. re plan issues (.5); telephone conference with M. Shinderman, etc from OCC, re plan issues (7).
05/29/20	C. Montgomery	2.10	1,680.00	B320	Participate in Verity pre-call regarding constituents waterfall and plan review (.4); participate in call with Prepetition Lenders re same (.4); participate in call with Creditors Committee re same (.8); preliminary review of Mintz comments on plan (.5)
05/29/20	N. Koffroth	2.20	1,103.30	B320	Participate in preparation call re plan with D. Galfus, P. Chadwick, et al. (0.8); participate in call with prepetition secured creditors re recovery model (0.4); participate in call with Committee counsel re recovery model (0.7); participate in internal call with P. Chadwick, D. Galfus, et al. re follow-up issues re recovery model (0.3)
05/29/20	N. Koffroth	2.70	1,354.05	B320	Draft plan of liquidation
05/30/20	N. Koffroth	2.00	1,003.00	B320	Participate in call with prepetition secured creditors re plan of liquidation
05/30/20	C. Montgomery	2.10	1,680.00	B320	Participate in phone conference with D Bleck and P Ricotta regarding changes to draft plan of liquidation (2.1)
05/30/20	S. Maizel	2.00	1,600.00	B320	Telephone call with Mintz Levin, etc. re plan issues

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/30/20	T. Moyron	2.70	1,617.98	B320	Analyze Mintz comments on Plan of Liquidation (.7); conference call with Mintz re Plan of Liquidation (2.0).
05/31/20	S. Maizel	0.10	80.00	B320	Telephone conference with T. Moyron re plan issues.
	<b>Subtotal</b>	<b>230.60</b>	<b>137,111.20</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	S. McCandless	1.40	1,118.60	EMP	

05/01/20	A. Shiran	1.70	874.65	EMP	
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05/04/20	A. Shiran	1.90	977.55	EMP	
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	S. McCandless	1.30	1,038.70	EMP	
05/05/20	A. Shiran		1,337.70	EMP	
05/05/20	S. McCandless	1.20	958.80	EMP	
05/06/20	S. Alberts	0.50	400.00	EMP	VHS. Weekly labor call.
05/07/20	D. Cook	2.20	1,037.87	EMP	
05/11/20	S. Maizel	0.30	240.00	EMP	
05/12/20	S. Maizel	0.60	480.00	EMP	
05/12/20	N. Koffroth	0.70	351.05	EMP	Participate in weekly call with R. Adcock, P. Chadwick, et al. re labor issues
05/12/20	S. Alberts	0.80	640.00	EMP	VHS. Weekly labor call.
05/12/20	T. Moyron	0.70	419.48	EMP	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	S. McCandless	0.50	399.50	EMP	
05/20/20	S. McCandless	0.20	159.80	EMP	
05/20/20	A. Shiran	0.20	102.90	EMP	
05/22/20	S. Maizel	0.40	320.00	EMP	
05/26/20	A. Shiran	0.80	411.60	EMP	
05/26/20	S. McCandless	0.20	159.80	EMP	
05/27/20	S. McCandless	1.20	958.80	EMP	
05/27/20	S. Alberts	0.40	320.00	EMP	VHS. Labor. Weekly call.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/20	A. Shiran	1.30	668.85	EMP	

05/28/20	A. Shiran	2.60	1,337.70	EMP	
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05/28/20	S. McCandless	1.30	1,038.70	EMP	
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05/29/20	S. McCandless	0.40	319.60	EMP	
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	A. Shiran	1.20	617.40	EMP	

<b>Subtotal</b>	<b>26.60</b>	<b>16,689.05</b>			
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/14/20	S. Maizel	0.20	160.00	INS	Telephone conference with Peg Anderson re Marrillac.
	<b>Subtotal</b>	<b>0.20</b>	<b>160.00</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/07/20	T. Moyron	0.20	119.85	MED/C	Analyze emails from P. Chadwick, et al. re Medicare matters.
05/08/20	N. Koffroth	0.20	100.30	MED/C	Participate in call with E. Levey, S. Maizel, et al. re Medicare settlement
	<b>Subtotal</b>	<b>0.40</b>	<b>220.15</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**REP - Reporting**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	K.M. Howard	0.10	25.08	REP	Email exchanges with N. Haslun regarding stay orders to attach as exhibits to Monthly Operating Report.
	<b>Subtotal</b>	<b>0.10</b>	<b>25.08</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2293305

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	25,584.89
B110	Case Administration	9,020.29
B130	Asset Disposition	4,453.31
B140	Relief from Stay/Adequate Protection Proceedings	100.30
B150	Meetings of and Communications with Creditors	640.00
B160	Fee/Employment Applications	21,418.88
	Less Discount to Client	(9,465.00)
B180	Avoidance Action Analysis	259.78
B185	Assumption/Rejection of Leases and Contracts	958.81
B190	Other Contested Matters (excl. assumption/rejection motions)	2,777.13
B200	Operations	1,760.00
B230	Financing/Cash Collections	7,606.66
B260	Board of Directors Matters	6,376.93
B300	Claims and Plan	26,133.54
B310	Claims Administration and Objections	1,722.95
B320	Plan and Disclosure Statement (incl. Business Plan)	137,111.20
EMP	Employee matters	16,689.05
INS	Insurance	160.00
MED/CMS	Medicare/CMS Issues	220.15
REP	Reporting	25.08
	Total This Matter	\$253,553.95

Verity Health System of California, Inc. June 28, 2020  
Invoice #: 2293305

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
B. Greer	\$800.00	26.20	\$20,960.00
C. Montgomery	\$800.00	67.00	\$53,600.00
S. Alberts	\$800.00	2.10	\$1,680.00
S. Maizel	\$800.00	35.50	\$28,400.00
P. Maxcy	\$739.50	3.20	\$2,366.40
S. McCandless	\$799.00	7.70	\$6,152.30
T. Moyron	\$599.25	68.20	\$40,869.00
J.A. Moe, II	\$599.25	28.50	\$17,078.75
K. Murphy	\$416.50	2.90	\$1,207.85
M. Zeefe	\$480.25	44.10	\$21,179.08
A. Shiran	\$514.50	12.30	\$6,328.35
C. Doherty, Jr.	\$374.00	4.30	\$1,608.20
L. Macksoud	\$437.75	14.70	\$6,434.94
N. Koffroth	\$501.50	90.10	\$45,185.15
A. Dondoyano	\$323.00	0.50	\$161.50
D. Cook	\$471.76	2.20	\$1,037.87
D. Pina	\$318.75	2.90	\$924.38
G. Medina	\$293.25	1.10	\$322.59
K.M. Howard	\$250.75	<u>30.00</u>	<u>\$7,522.59</u>
Totals		443.50	\$263,018.95

Fee Total \$ 253,553.95

Invoice Total \$ 253,553.95

Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293287**

Client/Matter: 15800425-000003

Verity Health System of California

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USA

June 28, 2020

**Invoice No. 2293287**

Client/Matter: 15800425-000003

Verity Health System of California

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/19/2020	FedEx Airbill #393012034795 05/19/20 Delivery to 735 TANGLEWOOD DR, LAFAYETTE, CA Pleadings	17.09
5/7/2020	ACE ATTORNEY, INVOICE 324738 5/07/20 DEL. PRIORITY TO, JOHN MOE 1852105 **MUST CALL BACK!!!!	102.30
5/28/2020	ACE ATTORNEY INVOICE 326178 6/05/20 DEL. PRIORITY 5/28/20 TO KATHERINE HAWORD 1855571	55.55
	<b>SUBTOTAL</b>	<b>174.94</b>
5/19/2020	Filing Fees ACE ATTORNEY INVOICE 326178 6/05/20 EFILING PRIORITY 5/19/20 TO SAN MATEO COUNTY SUPERIOR COUR1854087STATUS CONF. STMNT	67.50
5/5/2020	Filing Fees Samuel R. Maizel, Courtcall fee re April 0, 2020 telephonic hearing.	37.45
5/5/2020	Filing Fees Samuel R. Maizel, Courtcall fee re April 9, 2020 telephonic hearing.	31.85
5/5/2020	Filing Fees Tania M. Moyron, Attendance at hearing on April 9, 2020 by CourtCall for Verity.	31.85
5/5/2020	Filing Fees Tania M. Moyron, Attendance of Peter Chadwick at hearing on April 9, 2020 by CourtCall for Verity.	31.85
5/6/2020	Filing Fees Tania M. Moyron, Appearance at April 10, 2020 hearing by CourtCall.	37.45
5/6/2020	Filing Fees Tania M. Moyron, Appearance of Peter Chadwick at April 10, 2020 hearing by CourtCall.	37.45
5/1/2020	Filing Fees Tania M. Moyron, Appearance of Carsten Beith at April 1, 2020 hearing by CourtCall in Verity.	59.85
5/1/2020	Filing Fees Tania M. Moyron, Appearance of Peter Chadwick at April 1, 2020 hearing by CourtCall in Verity.	65.45
	<b>SUBTOTAL</b>	<b>400.70</b>
5/4/2020	Lexis MOYRON\ TANIA	50.67

Verity Health System of California

June 28, 2020

Matter: 15800425-000003

Invoice No.: 2293287

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/4/2020	Lexis COOK\ DAVID	27.71
5/4/2020	Lexis COOK\ DAVID	51.78
5/4/2020	Lexis COOK\ DAVID	99.38
5/4/2020	Lexis MONTGOMERY\ CLAUDE	105.89
5/7/2020	Lexis MOYRON\ TANIA	50.67
5/7/2020	Lexis COOK\ DAVID	149.05
5/10/2020	Lexis COOK\ DAVID	49.30
5/14/2020	Lexis MONTGOMERY\ CLAUDE	52.34
5/15/2020	Lexis MONTGOMERY\ CLAUDE	313.96
5/15/2020	Lexis SHIRAN\ ANNA	50.00
5/15/2020	Lexis SHIRAN\ ANNA	346.50
5/21/2020	Lexis COOK\ DAVID	49.38
5/21/2020	Lexis COOK\ DAVID	51.46
5/22/2020	Lexis COBARRUBIAS\ ELIZABETH	99.00
5/18/2020	Lexis SHIRAN\ ANNA	26.50
5/18/2020	Lexis SHIRAN\ ANNA	50.00
5/18/2020	Lexis SHIRAN\ ANNA	50.00
5/18/2020	Lexis SHIRAN\ ANNA	346.50
5/19/2020	Lexis SHIRAN\ ANNA	99.00
5/20/2020	Lexis SHIRAN\ ANNA	148.50
5/28/2020	Lexis MONTGOMERY\ CLAUDE	104.59
5/31/2020	Lexis MOYRON\ TANIA	50.85
5/31/2020	Lexis MOYRON\ TANIA	211.94
SUBTOTAL		2,634.97
5/18/2020	WESTLAW MACKSOD\LAUREN	225.00
5/19/2020	WESTLAW COOK\DAVID F	150.00
5/19/2020	WESTLAW MACKSOD\LAUREN	75.00
5/20/2020	WESTLAW COOK\DAVID F	75.00
5/21/2020	WESTLAW KOFFROTH\NICHOLAS	150.00



Verity Health System of California

June 28, 2020

Matter: 15800425-000003

Invoice No.: 2293287

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/21/2020	WESTLAW ZEEFE\MALKA	375.00
5/21/2020	WESTLAW COOK\DAVID F	2,055.68
5/21/2020	WESTLAW DOHERTY\CASEY	1,350.00
5/22/2020	WESTLAW KOFFROTH\NICHOLAS	455.00
5/22/2020	WESTLAW DOHERTY\CASEY	150.00
5/18/2020	WESTLAW HSU\ISABELLA	1,239.00
5/18/2020	WESTLAW YUR\CAROL	525.00
5/22/2020	WESTLAW YUR\CAROL	518.50
5/22/2020	WESTLAW SHIRAN\ANNA	375.00
5/25/2020	WESTLAW GREER\BRIAN	675.00
5/26/2020	WESTLAW KOFFROTH\NICHOLAS	210.00
5/26/2020	WESTLAW DOHERTY\CASEY	150.00
5/27/2020	WESTLAW KOFFROTH\NICHOLAS	75.00
5/28/2020	WESTLAW KOFFROTH\NICHOLAS	75.00
5/29/2020	WESTLAW DOHERTY\CASEY	225.00
5/29/2020	WESTLAW MACKSOD\LAUREN	300.00
5/12/2020	WESTLAW KOFFROTH\NICHOLAS	96.50
5/1/2020	WESTLAW COOK\DAVID F	378.96
5/1/2020	WESTLAW DOHERTY\CASEY	150.00
5/3/2020	WESTLAW COOK\DAVID F	375.00
5/4/2020	WESTLAW COOK\DAVID F	1,114.66
5/4/2020	WESTLAW DOHERTY\CASEY	75.00
5/7/2020	WESTLAW COOK\DAVID F	2,601.02
5/7/2020	WESTLAW DOHERTY\CASEY	300.00
5/3/2020	WESTLAW YUR\CAROL	75.00
5/4/2020	WESTLAW YUR\CAROL	225.00
SUBTOTAL		14,819.32
Total Disbursements		\$18,029.93
Disbursement Total		\$ 18,029.93

Verity Health System of California

June 28, 2020

Matter: 15800425-000003

Invoice No.: 2293287

Invoice Total

\$ 18,029.93

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June 28, 2020

**Invoice No. 2293306**

Matter: 15800425-000004  
O'Connor Hospital

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S. Maizel  
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June 28, 2020

**Invoice No. 2293306**


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For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000004  
O'Connor Hospital

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	K.M. Howard	0.40	100.30	B190	Analysis of the court's notice continuing the case management conference and reviewed and revised Litigation Management Chart accordingly.
05/05/20	K. Murphy	0.10	41.65	B190	/ Garcia / Analyze and respond to email from John Moe re upcoming Status Conference.
05/05/20	K. Murphy	0.10	41.65	B190	/ Garcia / Analyze Excel spreadsheet of Verity Litigation Matters to determine if Garcia is included, and draft email to John Moe to confirm that matter is included on chart.
05/05/20	J.A. Moe, II	0.10	59.93	B190	/Esmeralda Garcia v. O'Connor/ Review upcoming date for Case Management Conference in Santa Clara County and exchange E-Mails with Karleen Murphy on case.
05/05/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena -Avila-Burns v. Sentry Alarm Systems - / Analyze CT Corp notice of deposition subpoena for Person Most Knowledgeable and analyze subpoena (.1); and analyze email from Elina Tilman to Verity team summarizing and advising of the same (.1).
05/11/20	K. Murphy	0.20	83.30	B190	/ Garcia / Analyze Superior Court website to determine status of upcoming Case Management Conference set for 5/19/20 and analyze/download minute orders re continuation of the same (.1); and draft email to Verity Team advising of continued conference and update Verity Deadline Chart with 8/18/20 date (.1).

O'Connor Hospital.  
Matter: 15800425-000004  
Invoice No.: 2293306

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/11/20	K.M. Howard	0.40	100.30	B190	Reviewed court's notice of continuing the case management conference in Garcia v. O'Connor Hospital and reviewed and revised Litigation Management Chart accordingly.
05/22/20	K. Murphy	0.10	41.65	B190	/ Thomson / Attend telephone call with John Moe and Elina Tilman re case status and upcoming mediation.
05/22/20	J.A. Moe, II	0.10	59.93	B190	/Sydney Thomson v. O'Connor/ Conference telephone call with An Ruda and Elina Tilman on upcoming Status Conference and impact of Mediation on continuing the Status Conference.
05/26/20	K. Murphy	0.20	83.30	B190	/ Swain / Draft status conference statement and email to John Moe for review of the same.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Julio Rodriquez v. Santa Clara County/ Review Subpoenas for records and E-Mail to Karleen Murphy on "tracking" Subpoenas.
<b>Subtotal</b>		<b>2.00</b>	<b>755.24</b>		

O'Connor Hospital.  
Matter: 15800425-000004  
Invoice No.: 2293306

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B190	Other Contested Matters (excl. assumption/rejection motions)	755.24
	Total This Matter	\$755.24

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
J.A. Moe, II	\$599.25	0.30	\$179.79
K. Murphy	\$416.50	0.90	\$374.85
K.M. Howard	\$250.75	<u>0.80</u>	<u>\$200.60</u>
Totals		2.00	\$755.24
Fee Total	\$	755.24	
Invoice Total	\$	<u>755.24</u>	

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293307**

Matter: 15800425-000005  
St. Vincent Medical Center

Payment Due Upon Receipt

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Total This Invoice	\$ 5,168.66
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S. Maizel  
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June 28, 2020

**Invoice No. 2293307**


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For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000005  
St. Vincent Medical Center

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	A. Dondoyano	0.10	32.30	B130	Confer with K.Murphy re the SVMC APA litigation matters schedule.
05/07/20	K. Murphy	0.10	41.65	B130	/ SVMC APA Exhibit / Confer with John Moe re status of CNA adversary proceeding and draft further email to Adam Dondoyano re the same.
05/08/20	K. Murphy	0.10	41.65	B130	/ APA Exhibit/CNA matter / Conferred with John Moe and drafted email to Adam Dondoyano to set up telephone call to discuss updating list to include CNA matter.
05/28/20	A. Dondoyano	0.10	32.30	B130	Email to N.Nguyen re fully compiled APA and Disclosure Schedules.
	<b>Subtotal</b>	<b>0.40</b>	<b>147.90</b>		



St. Vincent Medical Center  
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Invoice No.: 2293307

June 28, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	T. Moyron	0.30	179.78	B185	Analyze matters related to updated Nant equipment agreement (.2); conference call with Jones Day re same and other matters (.1).
	<b>Subtotal</b>	<b>0.30</b>	<b>179.78</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	K. Murphy	0.30	124.95	B190	/SVMC APA Exhibit / Analyze AIG's Reservation of Rights Letter dated 4/20/20 re CNA (.1); and prepare addition of matter to Seton APA Exhibit and Verity Litigation Management Chart, and draft email to John Moe re the same (.2).
05/01/20	K. Murphy	0.20	83.30	B190	/SVMC APA Exhibit/ Analyze KCC website for Bankruptcy Court docket for CNA complaint filed on 3/5/20 (.1); and analyze Complaint (.1).
05/01/20	K. Murphy	0.10	41.65	B190	/ Hadley / Analyze and respond to email from Karen Chapman enclosing case update re joinder of all necessary plaintiffs in response to motion to abate.
05/01/20	J.A. Moe, II	0.10	59.93	B190	/Ian Brawner v. St. Vincent/ Review E-Mails from Karen Chapman and Alan Zhao on insurance issues related to AIG coverage of claim.
05/04/20	K.M. Howard	0.40	100.30	B190	Analysis of correspondence from plaintiff's counsel in Hadley v. St. Vincent proving notice of intent to amend the complaint and reviewed and revised Litigation Management Chart accordingly.
05/04/20	K.M. Howard	0.40	100.30	B190	Analysis of the court's notice setting the status conference and reviewed and revised Litigation Management Chart accordingly.
05/04/20	K. Murphy	0.10	41.65	B190	/SVMC APA Exhibit/Telephone call with voice message to John Moe re status of matter of CNA matter for Exhibit.
05/04/20	K. Murphy	0.10	41.65	B190	/ Phi / Research Superior Court website to determine if 6/4/20 Status Conference re Bankruptcy remains on calendar.
05/04/20	K. Murphy	0.10	41.65	B190	/SVMC APA Exhibit/ Draft email to John Moe enclosing CNA complaint filed on 3/5/20 in US District Bankruptcy Court.
05/05/20	J.A. Moe, II	0.10	59.93	B190	/John Phi v. St. Vincent/ Review notice regarding upcoming hearing and E-Mail to Karleen Murphy on status.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	K. Murphy	0.20	83.30	B190	/SVMC APA Exhibit/Telephone call with John Moe re details of adversary proceedings for APA Exhibit (.1); and research KCC website re adversary proceedings to determine adversary number for Exhibit and prepare edits to the same (.1).
05/05/20	K. Murphy	0.10	41.65	B190	/SVMC APA Exhibit/Draft email to Adam Dondoyano re SVMC APA Exhibit.
05/05/20	K. Murphy	0.10	41.65	B190	/SVMC APA Exhibit/Further call with John Moe re listing of CNA adversary proceedings on KCC website.
05/05/20	K. Murphy	0.10	41.65	B190	/ Phi / Analyze and respond to email from John Moe re upcoming Status Conference.
05/05/20	K. Murphy	0.20	83.30	B190	/ Phi / Prepare draft of Status Conference Statement and draft email to John Moe for draft review.
05/05/20	J.A. Moe, II	0.10	59.93	B190	/SVMC APA Exhibit/Telephone call with Karleen Murphy regarding updating the St. Vincent APA Exhibit on pending and threatened litigation.
05/06/20	K. Murphy	0.10	41.65	B190	/ Phi/ Draft email to Laurie Soledad re preparation of Status Conference Statement re Bankruptcy on June 4, 2020.
05/07/20	K. Murphy	0.10	41.65	B190	/ Phi / Telephone call re revisions to draft of Status Conference re Bankruptcy and draft email to Karen Chapman re the same.
05/08/20	K. Murphy	0.10	41.65	B190	/ Phi / Analyze minute order continuing 6/4/20 Status Conference re Bankruptcy due to COVID-19 and prepare update to Verity Litigation Deadline Chart re same.
05/08/20	K. Murphy	0.10	41.65	B190	/ Phi / Draft email to Louise Douville advising of 6/4/20 Status Conference re Bankruptcy due to COVID-19.
05/08/20	K.M. Howard	0.40	100.30	B190	Analysis of the Court' Notice continuing the Status Conference in John Phi v. St. Vincent Medical Center and reviewed and revised Litigation Management Chart accordingly.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/11/20	K. Murphy	0.10	41.65	B190	/ Chow / Analyze email from Karen Chapman forwarding email from litigation counsel re potential dismissal and draft email to John Moe forwarding the same.
05/11/20	K. Murphy	0.10	41.65	B190	/ Chow / Telephone call from John Moe re case facts.
05/11/20	J.A. Moe, II	0.10	59.93	B190	/Susan Chow v. St. Vincent/ Review string of E-Mails on possible dismissal of the Litigation, and E-Mail to and telephone call with Karleen Murphy on likelihood of dismissal.
05/18/20	K. Murphy	0.20	83.30	B190	/ Hadley / Analyze and respond to email from Karen Chapman enclosing case update from Fraser Watson re First Amended Complaint and Motion for Summary Judgment and analyzed the attached documents (.1); and draft email to Dentons' Verity team enclosing the same. (.1).
05/18/20	K.M. Howard	0.40	100.30	B190	Analysis of First Amended Complaint in Hadley v. St. Vincent Medical Center and reviewed and revised Litigation Management Chart accordingly.
05/18/20	K.M. Howard	0.40	100.30	B190	Analysis of the court's notice continuing the status conference in Sanford v. St. Vincent Medical Center and reviewed and revised Critical Dates Memorandum accordingly.
05/18/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena - Gilberto Pasmant - / Analyze email notice from CT Corp re subpoena for medical records of Gilberto Pasmant to SVMC, download and analyze subpoena and draft email to Verity team re same with production date (.1); and draft email to Dentons' Verity team and call with John Moe re the same (.1).
05/18/20	J.A. Moe, II	0.10	59.93	B190	/Medical Records - Gilbert Pasmant v. Woodruff Convalescent Center (St. Vincent)/ Confer with Karleen Murphy on responding to requests for medical records, and tracking requests and responses.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Joyce Al-Islam / Analyze email notice from CT Corp re subpoena for medical records, download and analyze subpoena and draft email to Verity team re same with production date.
05/21/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Leroy Scott / Analyze and respond to email from Elina Tilman advising to include Hope Levy-Biel on CT Corporation subpoena emails going forward.
05/22/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Leroy Scott / Analyze email from Elina Tilman to Verity Team advising of CT Corp subpoena for employment records and recommendations for responding to the same.
05/22/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena - Sprague/ Analyze email notice from CT Corp re subpoena for medical records, download and analyze subpoena to prepare for sending to Verity Team.
05/24/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Sprague / Draft email to Elina Tilman re confirmation of email to Verity Team with notice of subpoena and analyze response to the same.
05/27/20	K. Murphy	0.10	41.65	B190	Analyze notice of status conference.
<b>Subtotal</b>		<b>5.70</b>	<b>2,133.95</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

**B210 - Business Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	P. Maxcy	0.20	147.90	B210	Arrange for execution of SVMD assignment document.
	<b>Subtotal</b>	<b>0.20</b>	<b>147.90</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

**B250 - Real Estate**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/11/20	G. Medina	0.40	117.30	B250	Follow up with CSC regarding mechanics liens ordered.
	<b>Subtotal</b>	<b>0.40</b>	<b>117.30</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

**B310 - Claims Administration and Objections**


Date	Timekeeper	Hours	Amount	Task	Narrative
05/07/20	K.M. Howard	0.30	75.23	B310	Reviewed proof of claim and Application for Allowance of Administration Expense Claim filed by St. Vincent IPA.
	<b>Subtotal</b>	<b>0.30</b>	<b>75.23</b>		



St. Vincent Medical Center  
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Invoice No.: 2293307

June 28, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	C. Doherty, Jr.	5.10	1,907.40	EMP	
05/04/20	C. Doherty, Jr.	0.80	299.20	EMP	
05/11/20	S. Alberts	0.20	160.00	EMP	
<b>Subtotal</b>		<b>6.10</b>	<b>2,366.60</b>		SVMC. Receive update on NLRB action from BZBM and follow up with T. Moyron and S. Maizel concerning settlement.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2293307

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	147.90
B185	Assumption/Rejection of Leases and Contracts	179.78
B190	Other Contested Matters (excl. assumption/rejection motions)	2,133.95
B210	Business Operations	147.90
B250	Real Estate	117.30
B310	Claims Administration and Objections	75.23
EMP	Employee matters	2,366.60
Total This Matter		\$5,168.66

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
S. Alberts	\$800.00	0.20	\$160.00
P. Maxcy	\$739.50	0.20	\$147.90
T. Moyron	\$599.25	0.30	\$179.78
J.A. Moe, II	\$599.25	0.50	\$299.65
K. Murphy	\$416.50	3.40	\$1,416.10
C. Doherty, Jr.	\$374.00	5.90	\$2,206.60
A. Dondoyano	\$323.00	0.20	\$64.60
G. Medina	\$293.25	0.40	\$117.30
K.M. Howard	\$250.75	<u>2.30</u>	<u>\$576.73</u>
Totals		13.40	\$5,168.66
Fee Total		\$	5,168.66
Invoice Total		\$	<u>5,168.66</u>

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June 28, 2020

**Invoice No. 2293308**

Matter: 15800425-000006  
St. Francis Medical Center

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**Invoice No. 2293308**

For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000006  
 St. Francis Medical Center

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	T. Moyron	0.50	299.63	AGI	Analyze emails from H. Levy-Biehl et al. re anti-trust matters (.2); conference call with H. Levy-Biehl and S. Libowsky re same and FTC (.3).
05/05/20	S. Maizel	0.10	80.00	AGI	Review and respond to emails from J. Richlin re meeting with Attorney General office.
05/07/20	T. Moyron	0.70	419.48	AGI	Analyze emails from H. Levy-Biel re HSR (.2); analyze emails from Hope Levy-Biel, et al. and attachments re Follow-Up from AG (.3); conference call with R. Adcock re call from AG expert (.2).
05/08/20	T. Moyron	1.60	958.80	AGI	Call with AG, Prime, R. Adcock, et al. re waiver/process (.7); call with R. Adcock re same (.2); calls with S. Maizel re same (.2); analyze documents and emails from AG (.4); prepare emails re same (.1).
05/08/20	S. Maizel	0.70	560.00	AGI	Meeting with Attorney General, Prime, etc. re review issues.
05/11/20	T. Moyron	0.60	359.55	AGI	Conference call with AG's Office, Hope-Levy Biel, et al (.4); follow up call with Hope Levy-Biel and S. Maizel (.2).
05/11/20	S. Maizel	0.70	560.00	AGI	Telephone conference with Hope Levy Biehl, Scott Chan, etc. re AG review issues (.4); telephone conference with T. Moyron and H. Levy Biehl re same (.3).
05/12/20	T. Moyron	2.30	1,378.28	AGI	Analyze and prepare ex parte motion re AG (1.4); analyze R. Adcock, et al., emails re same (.6); conference call with Committee counsel re AG request re bids (.3).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	T. Moyron	0.20	119.85	AGI	Analyze AG letter denying waiver request (.1); analyze H. Levy-Biehl, et al. emails re same (.1).
05/12/20	S. Maizel	0.10	80.00	AGI	Review and respond to emails re Ex Parte Motion re providing bids to AG.
05/12/20	C. Montgomery	0.40	320.00	AGI	Phone call with T Moyron regarding AG confidentiality request and OSC.
05/12/20	N. Koffroth	5.30	2,657.95	AGI	Draft ex parte motion and related order re confidential disclosure of SFMC bids to the Attorney General
05/13/20	N. Koffroth	5.70	2,858.55	AGI	Draft ex parte application re confidential disclosure of SFMC bids to Attorney General
05/13/20	S. Maizel	1.00	800.00	AGI	Telephone conference with Prime, etc. re AG review issues.
05/13/20	S. Maizel	0.10	80.00	AGI	Telephone conference with N. Koffroth re ex parte motion re disclosure to AG.
05/13/20	C. Montgomery	0.20	160.00	AGI	Review SFMC ex-parte motion regarding providing confidential bidder information to Attorney General and communications with T Moyron re same.
05/13/20	K.M. Howard	0.30	75.23	AGI	Debtor's Ex Parte Motion for an Order Authorizing the Debtors to Disclose to the California Attorney General Bids for the Acquisition of Assets Related to St. Francis Medical Center Subject to Confidentiality Restrictions to determine related deadlines.
05/13/20	T. Moyron	1.00	599.25	AGI	Analyze and finalize ex parte motion and order (.8); and correspond regarding same (.2).
05/15/20	C. Montgomery	0.20	160.00	AGI	Review response to Ex-Parte Application for permission to permit use of confidential bidder information for attorney general.
05/15/20	T. Moyron	1.70	1,018.73	AGI	Analyze AG objection (.4); conference call with Committee counsel (.1) and Mintz (.1); analyze Committee response (.1) and prepare response (.1); further exchanges with Committee related thereto (.2); analyze matters related to response and AG issues (.3); analyze H. Levy-Biehl, et al. emails re same (.2).; analyze Mintz filing re AG (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/15/20	K.M. Howard	0.30	75.23	AGI	Analysis of California Attorney General's Objection to Debtors' Ex Parte Motion to Disclose General Bids.
05/15/20	K.M. Howard	0.20	50.15	AGI	Analysis of UMB Bank's Objection to Debtors' Ex Parte Application.
05/15/20	K.M. Howard	0.20	50.15	AGI	Analysis of the UCC's response to the AG's Objection to Debtors' Ex Parte.
05/15/20	N. Koffroth	0.90	451.35	AGI	Attention to issues re Attorney General opposition to motion to submit SFMC bids confidentially
05/15/20	J.A. Moe, II	0.30	179.78	AGI	Review Motion For An Order Authorizing The Debtors To Disclose Bids For The Acquisition Of St. Francis Medical Center Subject To Confidentiality Restrictions, including review of Ex Parte Motion, the Application and the Creditors Committee's Response, then review Judge Robles Order on briefing schedules, issues to be briefed and date for hearing.
05/18/20	R. Garms	0.80	482.80	AGI	Call regarding AG questions (0.3); follow up and e-mails regarding same (0.5).
05/18/20	S. Maizel	0.40	320.00	AGI	Review and respond to emails re disclosure of bids to AG (.1); review and revise draft letter re same to Scott Chan (.3).
05/18/20	T. Moyron	2.00	1,198.50	AGI	Analyze Order re ex parte motion (.2); analyze and prepare AG letter (1.2); prepare email to H. Levy-Biehl re Order (.1); analyze response and prepare email (.1); analyze related statute (.3); conference call with Mintz re order (.1).
05/18/20	K.M. Howard	0.40	100.30	AGI	Analysis of the Court's Order setting Debtors ex parte Motion for Order Authorizing Debtors to Disclose Bids for the Acquisition of St. Francis Medical Center for hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/18/20	N. Koffroth	3.90	1,955.85	AGI	Draft letter to Attorney General concerning confidential submission of indications of interest and bids in connection with Attorney General application

St. Francis Medical Center  
Matter: 15800425-000006  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	C. Montgomery	1.20	960.00	AGI	Communications with T Moyron and H Levy-Biehl regarding ex-parte motion and resolutions (.3); review draft letter to AG regarding Bid information (.9)
05/19/20	C. Montgomery	0.40	320.00	AGI	Review current draft letter to Attorney General regarding confidential Bid submission.
05/19/20	S. Maizel	0.40	320.00	AGI	Review and respond to emails re information for AG review.
05/19/20	S. Maizel	0.10	80.00	AGI	Review and revise letter to AG re confidential bids.
05/19/20	T. Moyron	1.20	719.10	AGI	Analyze and prepare letter to AG (.8); analyze email from H. Levy-Biel re same (.1); prepare email re same (.1); analyze email from J. Schlant and attached charts re AG requested information (.2).
05/19/20	N. Koffroth	4.60	2,306.90	AGI	Draft letter to Attorney General re confidential submission of bids
05/20/20	T. Moyron	2.80	1,677.90	AGI	Conference call with S. Maizel, et al. re AG requests, IOIs, Bids, etc. (1.5); conference call with J. Moloney, et al. (.8); conference call with C. Montgomery, et al. (.5).
05/20/20	N. Koffroth	2.80	1,404.20	AGI	Participate in calls analyzing issues re ex parte motion to submit bids to Attorney General on a confidential basis with J. Moloney (0.8) and internally x2 (1.5) (0.5)
05/20/20	N. Koffroth	0.90	451.35	AGI	Draft reply in support of ex parte motion to submit bids to Attorney General on a confidential basis
05/20/20	N. Koffroth	1.70	852.55	AGI	Draft letter to Attorney General re confidential submission of bids
05/20/20	C. Montgomery	3.10	2,480.00	AGI	Review letter transmitting bid information to AG (.1); review scheduling order regarding confidentiality of Bids (.2); and participate in phone conference with T Moyron, N Koffroth and S Maizel regarding same (1.6); continued conference call with J Moloney, S Maizel, N Koffroth and T Moyron re same (.8); continued call with S Maizel, N Koffroth and T Moyron regarding same (.4)

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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	S. Maizel	2.50	2,000.00	AGI	Telephone conference with T. Moyron, C. Montgomery, J. Moloney, etc. re disclosure of bids to AG.
05/21/20	S. Maizel	0.20	160.00	AGI	Telephone conference with T. Moyron and D. Eldan re pending motion re submission of bids to AG.
05/21/20	C. Montgomery	0.40	320.00	AGI	Communications with N Koffroth and M Zeefe regarding research for response to court's hearing directive (.1); communications with D Cook regarding bid procedures policy research (.1); communications with M Zeefe re same (.2)
05/21/20	N. Koffroth	9.40	4,714.10	AGI	Draft reply in support of ex parte motion to provide bids confidentially to Attorney General
05/22/20	T. Moyron	5.50	3,295.88	AGI	Analyze and prepare filing regarding bidding procedures and disclosure (4.7); analyze AG filing (.4); analyze email from Deputy AG (.1); prepare email to client and analyze emails regarding same (.3).
05/22/20	T. Moyron	3.10	1,857.68	AGI	Finalize reply to the AG's opposition re Ex Parte Motion and analyze related matters (2.4); analyze cases (.7).
05/22/20	N. Koffroth	1.00	501.50	AGI	Participate in calls re Ex Parte Motion re Confidential Bids with R. Adcock, et al. (0.3); H. Levy-Biehl, et al. (0.7)
05/22/20	N. Koffroth	12.30	6,168.45	AGI	Draft Reply in support of Ex Parte Motion re Confidential Bids
05/22/20	G. Medina	0.60	175.95	AGI	Work on and file Reply in Support of Ex Parte Motion For an Order Authorizing The Debtors To Disclose To The California Attorney General Bids For The Acquisition of Assets Related To St. Francis Medical Center Subject To Confidentiality Restrictions Filed by Debtor Verity Health System of California, Inc. (0.5); download and send to N. Koffroth and T. Moyron e filed copies (0.1).
05/22/20	S. Maizel	0.20	160.00	AGI	Telephone conference with T. Moyron, etc. re AG review issues.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	S. Maizel	0.70	560.00	AGI	Telephone conference with T. Moyron, etc. re response to Judge Robles order re AG submission.
05/22/20	S. Maizel	0.30	240.00	AGI	Telephone conference with D. Eldan, T. Moyron, etc. re response to Judge Robles order re AG submission.
05/22/20	S. Maizel	2.50	2,000.00	AGI	Review and revise response to Judge Robles re AG submission as confidential, including research.
05/22/20	S. Maizel	0.90	720.00	AGI	Drafting declaration in support of submission to Judge Robles re confidential bids (.7); telephone conference with T. Moyron re same (.2).
05/22/20	S. Maizel	0.20	160.00	AGI	Review and respond to email from E. Klein re confidential information request (.1); telephone conference with E. Klein re same (.1).
05/22/20	C. Montgomery	0.60	480.00	AGI	Communications with T Moyron, D Galfus regarding possible stipulation re bid delivery to AG (.1); prepare for call regarding AG stipulation bid information (.1); participate in call with R Adcock, T Moyron and D Galfus re same (.4)
05/26/20	T. Moyron	0.40	239.70	AGI	Analyze emails from H. Levy-Biehl and requests from AG and proposed responses.
05/26/20	T. Moyron	0.20	119.85	AGI	Analyze emails from D. Eldan re DC order (.1); prepare emails re same (.1).
05/26/20	N. Koffroth	0.60	300.90	AGI	Prepare for hearing re ex parte motion to submit bids confidentially
05/26/20	C. Montgomery	0.10	80.00	AGI	Review tentative decision on bid disclosure.
05/27/20	N. Koffroth	1.60	802.40	AGI	Attend hearing re ex parte motion to provide St. Francis bids to Attorney General on a confidential basis (1.2); prepare for hearing (0.2); participate in call with R. Adcock, H. Levy-Biehl, et al. re hearing (0.2)
05/27/20	S. Maizel	0.50	400.00	AGI	Review materials in preparation for hearing on motion re confidentiality of bids to AG.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/20	S. Maizel	1.80	1,440.00	AGI	Participate in hearing on motion re confidentiality of bids (1.3); telephone conference with D. Galfus, etc. re same (.2); telephone conference with R. Adcock re same (.3).
05/27/20	C. Montgomery	0.10	80.00	AGI	Phone call with T Moyron regarding May 27th hearing on bid disclosure.
05/27/20	K.M. Howard	0.40	100.30	AGI	Analysis of the Tentative Ruling and Order regarding the court set deadline for AG to submit a Brief in response to Debtors' request for a determination of the date upon which the AG's review period commenced and reviewed and revised Critical Dates Memorandum accordingly.
05/27/20	T. Moyron	1.40	838.95	AGI	Telephonic appearance re Ex Parte Motion re AG.
05/27/20	T. Moyron	0.40	239.70	AGI	Conference call with R. Adcock, et al. re post hearing discussion re AG re Ex Parte Motion (.1); conference call with S. Maizel re same (.1); analyze emails from H. Levy-Biehl and Prime counsel re response to AG (.2).
05/28/20	J.A. Moe, II	0.10	59.93	AGI	Review Order Granting Debtors' Ex Parte Motion For An Order Authorizing The Debtor To Disclose To The California Attorney General Bids For The Acquisition Of St. Francis Medical Center.
05/29/20	T. Moyron	0.40	239.70	AGI	Analyze correspondence from H. Levy-Biehl, J. Schlant re AG matters.
<b>Subtotal</b>		<b>100.40</b>	<b>58,436.40</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	S. Libowsky	1.80	1,440.00	B130	Teleconference with Jeff Brennan (0.40), FTC investigation matters (0.60), emails to and from Verity, Dentons, DWT teams (0.80).
05/03/20	S. Maizel	0.50	400.00	B130	Telephone conference with T. Moyron, P. Chadwick, etc. re SFMC sale issues.
05/03/20	S. Maizel	1.00	800.00	B130	Drafting response to Prime correspondence.
05/03/20	R. Garms	1.60	965.60	B130	Review and analyze letter and purchase agreement and draft potential responses regarding same.
05/04/20	S. Martin	0.60	456.45	B130	Review and comment on correspondence with Prime and APA.
05/04/20	T. Moyron	4.50	2,696.63	B130	Further analysis of Prime letter (.2); analyze APA, disclosure schedules and related matters (2.4); prepare and finalize letter (1.6); correspond with P. Chadwick, et al. re same (.3).
05/04/20	C. Montgomery	2.60	2,080.00	B130	Communications with T Moryon and S Martin regarding draft letter to Prime (.1); Review draft letter to Prime regarding APA renegotiations (.6); track down answer to S Martin inquiry (.3); follow up communications with T Moyron and S Martin regarding Attorney General reference and Reconsideration issues (1.0); communications with T Moyron regarding APA Disclosure schedule impact and change to letter (.2); communications with J Moloney, P Chadwick and T Moyron regarding Prime diligence (.2); phone call with T Moyron Re PEO treatment of letter to Prime Counsel (.1); review Prime reply (.1)
05/04/20	T. Moyron	1.60	958.80	B130	Conference call with R. Adcock, P. Chadwick, et al. re Prime (.5); conference call with P. Chadwick re Prime (.2); conference call with R. Adcock re Prime (.1); conference call with D. Galfus, et al. re Prime (.7); conference call with S. Maizel re Prime (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	T. Moyron	0.60	359.55	B130	Conference call with S. Libowsky re background and document request from FTC (.4); prepare emails to Cain and BRG re same (.1); and analyze responses thereto (.1).
05/04/20	R. Garms	2.10	1,267.35	B130	Review, analyze and discuss issues relating to purchase agreement and letter revisions.
05/04/20	S. Libowsky	5.70	4,560.00	B130	Review letter from FTC (.2), telephone call with FTC (.4), review and analyze all final bids and confidentiality agreements submitted before Prime was selected (3.4), emails to and from and telephone calls with Dentons, DWT, BRG teams (.9), telephone call with Jeff Brennan of MWE (.8).
05/04/20	S. Maizel	0.70	560.00	B130	Telephone conference with T. Moyron re response to Almon correspondence re SFMC sale issues (.4); review and respond to emails re same (.3).
05/04/20	S. Maizel	0.80	640.00	B130	Telephone conference with M. Garms and T. Moyron re response to Almon correspondence (.3); telephone conference with R. Adcock, BRG, Cain Bros. etc. re same (.5).
05/04/20	S. Maizel	0.60	480.00	B130	Telephone conference with D. Galfus and T. Moyron re Prime correspondence (.4); telephone conference with T. Moyron re same (.2).
05/04/20	S. Maizel	0.40	320.00	B130	Review and respond to emails from CMS re amounts due to and from re settlement.
05/04/20	N. Koffroth	2.40	1,203.60	B130	Participate in calls with T. Moyron, S. Maizel, et al. re St. Francis sale issues x3 (1.1) (0.6) (0.7)
05/05/20	T. Moyron	0.20	119.85	B130	Analyze BRG, et al., correspondence regarding SFMC ground lease and related matters.
05/05/20	S. Libowsky	4.20	3,360.00	B130	Teleconference with Jeff Brennan (0.50), Dentons, DWT teams (1.20), FTC follow-up and issues re: new document requests (0.40), strategy, analysis, procedures to get deal through FTC front office (2.10).
05/05/20	R. Garms	0.30	181.05	B130	E-mails regarding transaction issues.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	S. Maizel	0.70	560.00	B130	Telephone conference with R. Adcock, BRG, Cain Bros, etc. re sale issues (.6); telephone call with T. Moyron re same (.1).
05/05/20	S. Maizel	0.90	720.00	B130	Telephone conference with MWE and Prime re sale issues (.6); telephone conference with R. Adcock, etc. re same (.3).
05/05/20	S. Maizel	0.20	160.00	B130	Telephone conference with Tissue Bank re status of claims.
05/05/20	S. Maizel	2.40	1,920.00	B130	Telephone conference with Prime, R. Adcock, etc. re sale issues.
05/05/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, BRG, etc. re sale issues.
05/05/20	S. Maizel	0.40	320.00	B130	Telephone conference with Gary Gertler, MWE and T. Moyron re sale issues.
05/05/20	S. Maizel	0.60	480.00	B130	Review correspondence from G. Gertler re sale issues (.1); drafting correspondence to G. Gertler re sale issues (.5).
05/05/20	C. Montgomery	0.40	320.00	B130	Review Premier confidentiality issue for Prime.
05/05/20	A. Dondoyano	0.10	32.30	B130	Review email from R. Westhoff re SFMC PTR's.
05/05/20	S. Martin	0.30	228.23	B130	Review correspondence from Prime's counsel and related follow up from debtors and debtors counsel.
05/05/20	T. Moyron	3.00	1,797.75	B130	Conference call with Prime, R. Adcock, et al. (2.4); analyze emails from P. Chadwick re IPA summary (.2) and analyze related chart (.1); conference call with R. Adcock, BRG, et al. re Prime discussion (.3).
05/05/20	T. Moyron	1.30	779.03	B130	Conference call with Cain, BRG, R. Adcock re Prime (.5); call with Prime re Alman letter (.5); call with BRG, R. Adcock, et al. re call with Prime re letter (.3).
05/05/20	T. Moyron	0.30	179.78	B130	Exchange emails with Prime re call (.1); analyze emails from J. Richlin, et al. re labor (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	R. Westhoff	3.80	1,778.40	B130	Review email from J. Kiley re: disclosure schedule and title report issues (.1); review and analyze revised disclosure schedule re: owned real property (.2); review and analyze title commitment re: parking lot parcels at issue (.5); review and analyze recorded title exception documents referenced therein (.8); review and analyze Los Angeles County online tax records re: parking lot parcels at issue (.6); prepare summary analysis re: same (.7); review issues re: additional missing tax parcel from disclosure schedule (.2); coordinate revisions to same (.2); coordinate request from title company for additional title documents (.3); email summary analysis to J. Kiley and P. Chadwick (.2).
05/05/20	T. Moyron	1.50	898.88	B130	Conference call with R. Adcock re Prime (.5); conference call with G. Gertler and S. Maizel (.4); conference call with R. Adcock re same (.3); analyze follow up email and letter from G. Gertler (.1); prepare emails to R. Adcock, et al. re same and analyze responses (.2).
05/05/20	T. Moyron	0.30	179.78	B130	Analyze emails from Prime, et al., and respond to same re AG upcoming call and matters.
05/05/20	T. Moyron	0.20	119.85	B130	Exchange emails with Cain re data room.
05/05/20	N. Koffroth	0.60	300.90	B130	Participate in call with P. Chadwick, J. Moloney, et al. re sale process
05/05/20	N. Koffroth	0.30	150.45	B130	Participate in call with T. Moyron et al. re sale process
05/06/20	C. Montgomery	0.20	160.00	B130	Communications with R Westhoff regarding property schedule descriptions (.1); communications with T Moyron and S Maizel (.1)
05/06/20	C. Montgomery	0.20	160.00	B130	Communications with S Maizel regarding letter to Prime's counsel (.1) ; communications with R Wedthoff and J Kiley regarding MOB parking lot (.1)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	R. Westhoff	0.40	187.20	B130	Review email from T. Kaehler re: status of title report update (.1); review email from J. Kiley re: parking lot parcel issues (.1); review strategy re: same (.2).
05/06/20	S. Libowsky	3.30	2,640.00	B130	Teleconference with and emails to and from Jeff Brennan (.7), Dentons, DWT teams (.4), FTC follow-up and issues re: new document requests, strategy, analysis (.9), California AG document production issues (.8), confidentiality, what is required to be produced, timing (.5).
05/07/20	K. Murphy	0.80	333.20	B130	/EPL Chart/Telephone call with John Moe, Elina Tilman, and Luzanne Fernandez re CNA adversary proceeding related to EPL litigation for amendment to APA Exhibit of EPL claims against SFMC (.2); prepare edits to Exhibit and multiple revisions re the same (.4); telephone calls with John Moe re revisions (.1); and draft email to Karen Chapman with finalized document (.1).
05/07/20	T. Moyron	1.40	838.95	B130	Conference call with A. Ruda, R. Adcock, et al (.5); analyze emails from J. Richlin, et al. re labor (.4); analyze matters related to confidentiality (.3); exchange emails with S. Alberts re meetings (.2).
05/07/20	S. Libowsky	2.90	2,320.00	B130	Emails to and from Dentons, DWT teams re: HSR and related disclosures to California AG (1.10), FTC follow-up and issues re: new document requests, strategy, analysis (0.60), California AG document production issues, confidentiality, what is required to be produced, timing (1.20).
05/07/20	R. Westhoff	0.90	421.20	B130	Continue review of parking lot issues (.2); telephone call to J. Kiley re: same (.2); email to J. Kiley re: same (.1); review emails from T. Kaeler, R. Adcock, and T. Patmavanu re: updated preliminary title report (.1); review same (.3).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/07/20	K. Murphy	0.40	166.60	B130	/EPL Chart/Analyze multiple emails from Employment Law Group and Karen Chapman seeking updated SFMC list of EPL claims and respond to the same (.1); telephone conferences with John Moe re edits to current APA Exhibit as to CNA matter (.2); prepare edits to the APA Exhibit and draft email to Karen Chapman enclosing list of EPL claims (.1).
05/07/20	K. Murphy	0.10	41.65	B130	/ EPL Chart / Analyze email from Karen Chapman following delivery of updated EPL claims chart and respond to the same enclosing the CNA complaint.
05/07/20	A. Dondoyano	1.10	355.30	B130	Compile complete version of SFMC APA.
05/07/20	S. Maizel	0.30	240.00	B130	Review and respond to emails re HSR submission.
05/08/20	K. Murphy	0.20	83.30	B130	/EPL Chart/Analyze multiple emails from Karen Chapman, Hope Levy-Biel, and Tania Moyron regarding redacting names from ELP list (.1) and confer with John Moe re the same (.1).
05/08/20	T. Moyron	2.10	1,258.43	B130	Analyze email from Prime re documents (.2); exchange emails with R. Adcock, P. Chadwick, et al re same (.2); conference call with P. Chadwick re same (.1); conference call with H. Levy-Biehl re same (.4); exchange emails and participate in UNAC union meeting (.6); follow up call with A. Ruda, et al. re inquiries from UNAC re PTO, severance, etc (.6).
05/08/20	S. Libowsky	4.60	3,680.00	B130	Teleconferences with and emails to and from Dentons, DWT teams (1.40), work on production to California AG issues (0.60), Clean Room production of documents to Prime issues/matters (0.90), review multiple emails re: Prime's document requests and issues (1.70).
05/08/20	C. Montgomery	0.10	80.00	B130	Communications with T Kaehler re St. Francis Title Report
05/08/20	S. Maizel	1.00	800.00	B130	Revising CMS settlement re provider agreement.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/08/20	K. Murphy	0.20	83.30	B130	/EPL Chart/Telephone call with John Moe and Adam Dondoyano re revisions to APA Exhibit on the EPL claim to add the CNA matter and draft email to Mr. Dondoyano with copy of revised document previously sent to Karen Chapman.
05/08/20	J.A. Moe, II	0.30	179.78	B130	/EPL Chart/In regard to the updated List on the EPL Claims, review multiple E-Mails on parties identified in the List, and confer with Karleen Murphy on requirements for the List (.20); E-Mail to Hope Levy Biehl on requirements for the List (.10).
05/09/20	S. Libowsky	1.80	1,440.00	B130	Clean Room production of documents to Prime issues/matters (0.70), review multiple emails re: Prime's document requests and issues (1.10).
05/10/20	S. Libowsky	2.40	1,920.00	B130	Teleconferences with and emails to and from Eitan Kagedan (1.30), Clean Room production of documents to Prime issues/matters (0.40), review multiple emails re: Prime's document requests and issues (0.70).
05/10/20	E. Kagedan	4.70	2,037.45	B130	Analyze documents in Clean Room to confirm competitively sensitive nature thereof.
05/11/20	T. Moyron	1.70	1,018.73	B130	Analyze emails from H. Levy Biehl re anti-trust matters (.2); analyze chart and prepare comments to same (.4); analyze Verity emails re documents to Prime (.3); prepare emails to H. Levy, Biehl re same (.3); analyze summary of documents reviewed (.2); correspond with S. Libowsky re same (.2); conference call with R. Adcock re same (.1).
05/11/20	T. Moyron	0.20	119.85	B130	Analyze emails from H. Kevane, et al. re Protocol to Resolve SFMC Risk Pools and prepare email regarding call.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/11/20	S. Libowsky	6.20	4,960.00	B130	Teleconference with and emails to and from DWT re: allowing Prime access to some or all materials in "clean room" portion of due diligence room (1.30), Teleconference with and emails to and from Eitan Kagedan re: allowing Prime access to some or all materials in "clean room" portion of due diligence room (1.20), Review of documents and materials in "clean room" portion of due diligence room to determine what, if any, access Prime can have to these materials (2.70), Drafting responses to Prime on document and production requests, principally for materials in the "clean room" (1.0).
05/11/20	E. Kagedan	1.60	693.60	B130	Analyze competitive sensitivity of documents requested by Prime.
05/12/20	T. Moyron	0.70	419.48	B130	Analyze H. Levy-Biehl and S. Libowsky, et al., correspondence re document requests and related matters.
05/12/20	E. Kagedan	0.70	303.45	B130	Review emails regarding Prime requests for information.
05/12/20	S. Libowsky	7.10	5,680.00	B130	Review Health Plan of San Mateo Agreement and Amendments for possible production to Seton MC Buyer, work on competitively sensitive and confidentiality issues related to this Agreement, teleconference with Nam Nguyen, Sheila Mueller on these matters (1.40), review and analyze EXCEL spreadsheets containing HR and employee information produced and to be produced to Prime, teleconference with Brenda Bachus to determine what has and can be produced (2.30), review Prime's current information requests for HR, supply chain, medical and financial, contract, executive information to determine what can be produced or is competitively sensitive, mark-up Prime's requests accordingly, work on response to Prime's requests (2.20), teleconference with Dentons, DWT teams on all pending antitrust, competitively sensitive information issues (1.20).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	N. Koffroth	0.80	401.20	B130	Participate in weekly internal call with Cain and BRG concerning sale status
05/13/20	C. Montgomery	0.60	480.00	B130	Communications with T Moyron and H Levey-Biehl regarding response to Prime counsel.
05/13/20	S. Libowsky	1.90	1,520.00	B130	Review emails and materials from Claude Montgomery Hope and Levy-Biehl on Verity/Premier relationship and settlement to determine competitively sensitive information (0.70), review emails and materials and edit Hope Levy-Biehl's responses to Prime on document and information production issues and disputes (0.80), emails to and from Verity, Dentons, DWT following up on production of Health Plan of San Mateo documents and information to SMC Buyer (0.40).
05/13/20	T. Moyron	1.60	958.80	B130	Conference call with Prime re labor and AG (1.0); analyze Prime emails re labor (.2); respond to same (.1); exchange emails with R. Adcock, et al. re 1113 motion timing and Prime emails (.3).
05/14/20	S. Libowsky	2.70	2,160.00	B130	Review materials already produced to Prime re: Verity/Premier relationship to determine competitively sensitive information (0.80), emails to and from and review materials from Hope Levy-Biehl, David Maas to determine and advise on competitively sensitive information with regard to St. Francis service contracts (1.10), review emails and materials and edit responses to Prime on document and information production issues and disputes (0.40), teleconference with Jeff Brennan of MWE re: FTC investigation, status, expiration of the waiting period (0.40).
05/15/20	S. Maizel	0.30	240.00	B130	Telephone conference with Henry Kevane re recoupment by plan issues in sale.
05/15/20	S. Libowsky	1.20	960.00	B130	Document production issues/matters to Prime to ensure antitrust law compliance (0.90), follow-up on FTC matters (0.30).
05/18/20	S. Libowsky	0.60	480.00	B130	Document production issues/matters to Prime to ensure antitrust law compliance.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	S. Maizel	1.00	800.00	B130	Review and revise settlement with CMS for Medicare provider agreements.
05/18/20	S. Maizel	1.00	800.00	B130	Review and revise settlement agreement with DHCS re SFMC.
05/19/20	R. Garms	1.10	663.85	B130	Calls regarding submission response and related issues (0.6); review materials regarding same (0.3); e-mails regarding same (0.2).
05/19/20	R. Westhoff	0.20	93.60	B130	Review email from T. Kaehler re: survey for ground leased medical office building (.1); review same (.1).
05/19/20	S. Libowsky	2.80	2,240.00	B130	Emails to and from and teleconference with Henry Kevane, Tania Moyron, Hope Levy-Biehl, work on issues related to Prime's desires and attempts to obtain managed care capitation agreements (1.20), review chart of managed care capitation agreements and agreements in "clean room" (1.10), teleconference with Matt Garms re: confidentiality issues in populating due diligence room (0.50).
05/19/20	A. Dondoyano	0.10	32.30	B130	Review updated ALTA survey.
05/20/20	D. Cook	0.20	94.35	B130	Communications with N Koffroth regarding bid procedures issues.
05/20/20	C. Montgomery	0.10	80.00	B130	Review stipulations regarding cure objection extensions.
05/20/20	S. Libowsky	1.40	1,120.00	B130	Emails to and from and teleconference with Nick Koffroth, Henry Kevane, Tania Moyron, Hope Levy-Biehl, [REDACTED] [REDACTED] review documents to understand confidentiality issues in populating due diligence room (.6).
05/20/20	R. Garms	0.30	181.05	B130	E-mails regarding application.
05/20/20	N. Koffroth	0.30	150.45	B130	Draft stipulation and order continuing objection deadline re transfer of provider agreements
05/20/20	N. Koffroth	0.30	150.45	B130	Draft stipulation and order continuing objection deadline re transfer of provider agreements

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/20	S. Libowsky	0.40	320.00	B130	
05/21/20	S. Maizel	0.50	400.00	B130	Telephone conference with McDermott counsel re settlement with DHCS and CMS re provider agreements.
05/21/20	S. Maizel	0.80	640.00	B130	Telephone conference with T. Moyron re settlement proposal re DHCS (.2); telephone conference with F. Sze, Hope Levy Biehl, etc. re same (.6).
05/21/20	S. Maizel	0.50	400.00	B130	Draft email to G. Gertler re transfer of fraud liability under Medicare.
05/21/20	M. Zeefe	3.80	1,824.95	B130	Research re bidding procedures.
05/21/20	A. Dondoyano	0.20	64.60	B130	Review updated ALTA survey.
05/21/20	R. Garms	0.40	241.40	B130	Review draft response.
05/21/20	E. Cobarrubias	0.50	133.88	B130	
05/21/20	D. Cook	3.20	1,509.63	B130	Research regarding role of bid procedures in connection with SFMC (2.8); draft email memorandum for Dentons team review regarding same (.4).
05/22/20	M. Zeefe	0.70	336.18	B130	Review federal bankruptcy preemption cases.
05/22/20	R. Garms	0.20	120.70	B130	E-mails regarding response.
05/22/20	S. Libowsky	1.40	1,120.00	B130	Review emails from Hope Levy-Biehl (.2), teleconference with Tania Moyron (.3), review materials submitted to California Attorney General and in due diligence and clean rooms (.9), all concerning confidentiality of Verity Health information.
05/23/20	S. Maizel	1.50	1,200.00	B130	Review and revise settlement proposal for DHCS.
05/23/20	S. Maizel	0.60	480.00	B130	Reviewing "offer" from Prospect (.1); research re accepting offers after final court (.5).
05/24/20	T. Moyron	0.60	359.55	B130	Conference call with counsel for Prospect (.3); conference calls with S. Maizel re same (.3).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/24/20	S. Maizel	0.40	320.00	B130	Telephone conference with T. Paterson, counsel for Prospect, re potential "offer".
05/24/20	S. Maizel	1.50	1,200.00	B130	Revising CMS settlement agreement.
05/26/20	R. Garms	0.70	422.45	B130	Review and comment on summary document (0.4); e-mails regarding transaction questions (0.3).
05/26/20	R. Westhoff	0.30	140.40	B130	Review email from J. Richlin re: real estate issues with disclosure schedule (.1); review issues list re: same (.1); gather details on preparation of disclosures (.1).
05/26/20	A. Dondoyano	0.20	64.60	B130	Review real estate schedule questions from Prime and confer with R. Westhoff re same.
05/26/20	S. Maizel	0.30	240.00	B130	Telephone conference with T. Moyron, etc. re Prospect proposal re alternative transaction.
05/26/20	S. Maizel	0.20	160.00	B130	Draft response to T. Patterson re Prospect proposal re alternative transaction.
05/26/20	N. Koffroth	0.50	250.75	B130	Participate in call with R. Adcock, P. Chadwick, et al. re sale status and closing matters
05/26/20	T. Moyron	0.50	299.63	B130	Analyze tentative ruling re Ex Parte Motion (.2); analyze letter from S. Chan (.2); analyze email from counsel from Prime re AG matters (.1).
05/26/20	T. Moyron	0.20	119.85	B130	Analyze emails from J. Richlin, et al. re clean team matters.
05/26/20	T. Moyron	1.20	719.10	B130	Analyze emails from J. Richlin, et al. re press release, clean team agreement, etc. (.2); prepare emails to J. Richlin re same (.2); conference call with J. Richlin re same (.2); conference call with R. Adcock re same and related matters (.6).
05/26/20	K.M. Howard	0.20	50.15	B130	Email exchange with T. Moyron regarding the clean team agreement (.1); reviewed and incorporated agreement (.1).
05/26/20	S. Maizel	0.40	320.00	B130	Telephone conference with Paul Ricotta, Dan Bleck, etc. re sale issues.
05/26/20	S. Libowsky	0.80	640.00	B130	Review emails and Clean Team Agreement among Verity Health, Dentons, DWT, Prime, and West Healthcare Consulting.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/20	T. Moyron	0.30	179.78	B130	Conference call with M. Shinderman re AG and Prospect.
05/27/20	T. Moyron	0.20	119.85	B130	Conference call with A. Dondoyano re closing checklist and timing.
05/27/20	A. Dondoyano	0.90	290.70	B130	Review real estate questions from Prime and confer with T.Moyron re same and deal process (0.4); Confer with N.Nguyen re closing checklists (0.1); Confer with C.Johnson re SFMC IMA (0.1); Confer with R.Westhoff re real estate questions from Prime (0.3).
05/27/20	R. Westhoff	0.50	234.00	B130	Review and respond to emails from R. DeDona re: real estate issues in disclosure schedules (.1); review and analyze same (.3); confirm details re: preparation of same (.1)
05/27/20	K.M. Howard	0.10	25.08	B130	Prepared email to T. Moyron regarding the St. Francis - Clean Team documents.
05/28/20	R. Westhoff	4.70	2,199.60	B130	Review email from R. DeDona re: additional real estate issue arising from review of disclosure schedules (.1); follow up on status of updated title commitment and recorded documents from title company (.2); review and analyze issues re: leases for 4390 Tweedy Blvd, 9404 Burtis Street in South Gate, California (.5); review prior drafts of disclosures re: same (.4); prepare response re: same (.2); review and analyze issues re: subleases for 3628 E. Imperial Highway, Lynwood, California (.3); review data room and gather details re: same (.5); summarize same (.2); review and analyze issues re: expired leases (.3); confirm expiration and tenant move-out re: same (.4); review and analyze issues re: Nantworks Facility License Agreement for call center (.4); gather details re: same (.3); review status of lease for 7840 Imperial Highway, Downey, California (.2); confirm expiration of same (.2); revise response to issues list (.3); email to P. Chadwick and T. Kaehler re: same (.1); email to R. DeDona re: status of same (.1).
05/28/20	S. Maizel	0.30	240.00	B130	Review and respond to emails re DHCS settlement proposal.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/28/20	S. Maizel	0.40	320.00	B130	Review and revise Prime press release re sale.
05/28/20	T. Moyron	0.50	299.63	B130	Conference call with R. Adcock regarding labor matters, press release and other matters.
05/28/20	T. Moyron	0.40	239.70	B130	Analyze press release (.1); analyze emails from H. Levy-Biehl, et al. re same (.2); prepare email re same (.1).
05/28/20	A. Dondoyano	0.10	32.30	B130	Confer with R. Westhoff re questions to the title company.
05/28/20	T. Moyron	0.50	299.63	B130	Prepare release (.4); prepare email to R. Adcock regarding revised release (.1).
05/29/20	N. Koffroth	0.30	150.45	B130	Draft joint press release re sale
05/29/20	A. Dondoyano	0.50	161.50	B130	Review emails from R. Westhoff, Cain and BRG re real estate questions from Prime (0.3); Draft email to Cain and BRG re real estate questions for title company (0.2).
05/29/20	R. Garms	1.40	844.90	B130	Review purchase agreement and comment on release document (1.1); e-mails and follow-up call regarding same (0.3).
05/29/20	S. Libowsky	1.30	1,040.00	B130	Emails to and from Verity, Dentons, DWT teams re: data and information flow to Prime (0.40), strategy and analysis of going forward on requested information (0.90).
05/29/20	R. Westhoff	1.40	655.20	B130	Review emails from P. Chadwick and T. Kaehler re: draft responses to issues raised by R. DeDona (.2); finalize same (.3); email to R. DeDona re: same (.1); coordinate inquiries to title company re: 1/17th owned parking lot (.2); follow up on issues re: termination of Nantworks Facility Lease Agreement for call center (.3); review title commitment issues (.2); review email from T. Kaehler re: same (.1).
05/29/20	T. Moyron	1.10	659.18	B130	Correspond with counsel for CNA re stipulations (.3); analyze updated stipulations (.2); prepare emails to R. Adcock re same (.1); correspond with counsel for UNAC re timing of filed brief (.2); analyze proposed stipulation (.1); correspond with counsel for UNAC regarding stipulation (.2).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	T. Moyron	0.50	299.63	B130	Analyze zip folders with bids (.2); conference calls with H. Levy-Biehl re same (.1); analyze related emails (.2).
05/29/20	T. Moyron	0.80	479.40	B130	Conference call with N. Koffroth re order, bids, release and plan matters.
05/30/20	R. Garms	0.40	241.40	B130	Review and analyze diligence questions and related issues.
05/31/20	S. Maizel	0.80	640.00	B130	Telephone conference with Prime, etc. re CBA issues.
	<b>Subtotal</b>	<b>156.00</b>	<b>103,991.50</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	J.A. Moe, II	0.70	419.48	B140	/ Mariabelen Basulto v. St. Francis/ Telephone call returned to Nicole Podgurski on possible Stipulation for relief form stay (.10); review form of Stipulation and Order previously prepared in first case with Mr. Donahue (.20); prepare draft of a Stipulation on relief from stay (20); prepare draft of Order on relief from stay (.10); exchange E-Mails with Andres Estrada on receipt of Notices and failure to file a claim (.10).
<b>Subtotal</b>		<b>0.70</b>	<b>419.48</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B150 - Meetings of and Communications with Creditors**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	S. Maizel	0.20	160.00	B150	Review and respond to emails re Medicare offset against hospital.
	<b>Subtotal</b>	<b>0.20</b>	<b>160.00</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	T. Moyron	0.30	179.78	B185	Conference call with H. Kevane, P. Chadwick, et al. re risk pool matters.
05/19/20	D. Cook	1.30	613.29	B185	Draft cure objection stipulation (1.1); analysis regarding counterparties to same (.2);
05/19/20	T. Moyron	0.60	359.55	B185	Analyze and prepare comments to notice re Prime designation (.3); analyze email and chart from BRG (.1); analyze email from J. Richlin, et al. (.2).
05/19/20	T. Moyron	0.50	299.63	B185	Conference call with H. Kevane and S. Libowsky re confidentiality/anti-trust matters re documents (.3); analyze H. Levy-Biehl, et al re same (.2).
05/20/20	N. Koffroth	2.30	1,153.45	B185	Draft stipulation and order re cure objections and communications with counsel to counterparties re the same
05/20/20	D. Cook	4.40	2,075.74	B185	Analysis and composition regarding omnibus cure extension stipulation (3.9); communications with N Koffroth regarding same (.5);
05/21/20	K.M. Howard	0.50	125.38	B185	Analysis of the Second Stipulations (x2) and Orders(2) approving same continuing the DHCS and DHHS deadlines and hearings on the transfer of Medi-Cal and Medicare Provider Agreements and reviewed and revised Critical Dates Memorandum accordingly.
05/21/20	K.M. Howard	0.40	100.30	B185	Analysis of the Fourth Omnibus Stipulation to continue hearing and deadlines regarding cure amounts and assumption issues and reviewed and reviewed Critical Dates Memorandum.
05/21/20	D. Cook	1.10	518.94	B185	Analysis and composition regarding omnibus cure extension stipulation (.9); communications with N Koffroth regarding same (.2);
05/21/20	N. Koffroth	0.80	401.20	B185	Draft omnibus stipulation and order re cure objections and communications with counsel to counterparties re same

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	N. Koffroth	0.70	351.05	B185	Draft stipulation and order continuing Cigna cure objection (0.4); draft stipulation and order continuing Angeles IPA cure objection (0.3)
05/26/20	K.M. Howard	0.30	75.23	B185	Analysis of Order approving Stipulation continuing hearing and deadlines concerning Angeles IPA Medical Group cure amounts and reviewed and reconciled same to Critical Dates Memorandum.
05/26/20	K.M. Howard	0.40	100.30	B185	Analysis of Stipulation to extend hearing and related deadlines pertaining to cure objections filed by Cigna and reviewed and revised Critical Dates Memorandum accordingly.
05/26/20	K.M. Howard	0.30	75.23	B185	Analysis of the Order approving Stipulation to extend hearing and related deadlines pertaining to cure objections filed by Cigna and reviewed and reconciled same to Critical Dates Memorandum.
05/28/20	K.M. Howard	0.40	100.30	B185	Analysis of the Stipulation extending the SEIU's opposition deadline to Debtors' Motion to Reject Collective Bargaining Agreement and reviewed and revised Critical Dates Memorandum accordingly.
<b>Subtotal</b>		<b>14.30</b>	<b>6,529.37</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	K. Murphy	0.10	41.65	B190	/ Cortes / Analyze email from LA court clerk re updated service list for plaintiff's counsel and draft email to Laurie Soledad to update the same.
05/01/20	K.M. Howard	0.40	100.30	B190	Reviewed email from plaintiff's counsel in Sinthia Cortes v. St. Francis Medical Center and reviewed and revised Litigation Management Chart accordingly.
05/04/20	K. Murphy	0.20	83.30	B190	/ Quinones / Research Superior Court website to determine if 6/4/20 Status Conference re Bankruptcy remains on calendar and download/analyze minute order re continuation of the same (.1); and draft email Verity team re continuation and draft update to Verity Litigation Deadline Chart with continued date (.1).
05/04/20	K. Murphy	0.20	83.30	B190	/ Correa / Research Superior Court website to determine if 6/11/20 Status Conference re Bankruptcy remains on calendar and download/analyze minute order re continuation of the same (.1); and draft email to Verity team re continuation and draft update to Verity Litigation Deadline Chart with continued date (.1).
05/04/20	K.M. Howard	0.40	100.30	B190	Analysis of the Court's Notice continuing the Status Conference in Correa v. St. Francis Medical Center and reviewed and revised Litigation Management Chart accordingly.
05/04/20	K.M. Howard	0.40	100.30	B190	Analysis of the Court's Notice regarding the continuance of the Status Conference and Trial Setting Conference in Quinones v. St. Francis Medical Center and reviewed and revised Litigation Management Chart accordingly.
05/04/20	J.A. Moe, II	0.10	59.93	B190	/Sinthia Cortes v. St. Francis/ Review notice on and proposed Statement to be prepared in regard to the continued Status Conference.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	J.A. Moe, II	0.10	59.93	B190	/Adamari Zavala v. St. Francis/ Review Minute Order on rescheduling in December the Status Conference and E-Mail to Karleen Murphy on Order.
05/05/20	K. Murphy	0.10	41.65	B190	/ Ancira / Analyze email from Karen Chapman enclosing litigation counsel's status update re plaintiff's request for mediation.
05/05/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena -Eddie Gonzales / Analyze email from Nam Nguyen re notice of CT Corp notifications and enclosure of Gonzales subpoena (.1); analyze subpoena and email from Karen Chapman re the same (.1).
05/05/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena -Latrice Jones / Analyze notice from CT Corp re subpoena for Workers' Compensation records for Latrice Jones and analyze subpoena (.1); confer with Elina Tilman re the same and analyze Ms. Tilman's email to Verity Team re subpoena (.1).
05/06/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Latrice Jones / Analyze response email from Kelli Vitale re contacting human resources at specific facility re production of Workers' Compensation records pursuant to subpoena.
05/06/20	K. Murphy	0.60	249.90	B190	/ CT Corp Subpoena -Bay Area Surgical - / Analyze notice of subpoena for records and analyze subpoena (.1); analyze multiple emails from Elspeth Paul, Elina Tilman, Henry Kevane, and Steve Kahn re nature of matter and preparing objections to the same(.2); and research Contra Costa Superior Court website re case information, and download and review complaint to address questions from Mr. Kahn re nature of case (.3).
05/06/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena -Eddie Gonzales / Analyze CT Corp notification of subpoena for employment records and analyze subpoena (.1); analyze email from Elina Tilman to Verity Team re details of production for the same. (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena -Eddie Gonzales / Analyze further email from Elina Tilman re confirmation that no proof of claim was found for Mr. Gonzales.
05/06/20	J.A. Moe, II	0.10	59.93	B190	/Cynthia Sorto v. St. Francis/ Review notice of upcoming Case Management Conference and E-Mail to Karleen Murphy on hearing on June 4th; review additional E-Mails from Ms. Murphy and Elina Tilman on representation at the upcoming hearing.
05/06/20	K. Murphy	0.10	41.65	B190	/ Corto / Analyze and respond to email from John Moe re status of updated service list per email from court clerk. .
05/06/20	K. Murphy	0.30	124.95	B190	/ Sorto / Analyze and respond to email from John Moe re case status and upcoming Case Management Conference (.1); analyze court website to determine if 6/4/20 Status Conference remains on calendar and analyze minute order continuing the same (.1); draft update to Verity Litigation Deadline Chart and draft email to Elina Tilman enclosing minute order to advise of continuation (.1).
05/12/20	J.A. Moe, II	0.10	59.93	B190	/Josefina Robles v. St. Francis/ Review letter from Gillian Pluma on setting date for Mediation on June 29, 2020.
05/13/20	J.A. Moe, II	0.20	119.85	B190	/Josefina Robles v. St. Francis/ Review Gillian Pluma's letter report on testimony of Plaintiff's Expert Dr. David Patterson.
05/13/20	K. Murphy	0.20	83.30	B190	/ Robles / Analyze email from Karen Chapman enclosing case update with detailed deposition report of Plaintiff's Rehabilitation Expert (.1); and draft email to Dentons' Verity Team re the same (.1).
05/14/20	K. Murphy	0.10	41.65	B190	/ Robles / Analyze email from Elspeth Paul enclosing information re upcoming mediation and draft email to Dentons' Verity Team re the same.
05/18/20	K.M. Howard	0.60	150.45	B190	Analysis of letter setting mediation in Robles v. St. Francis and reviewed and revised Litigation Management Chart accordingly (.4); analysis of independent medical examination of plaintiff (.2).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/20	K. Murphy	0.10	41.65	B190	/ Sorto / Analyze and respond to email from John Moe re status conference previously set for June 4th and continued to later date due to COVID19.
05/21/20	K. Murphy	0.20	83.30	B190	/ Fuentes / Analyze email from Karen Chapman enclosing summary of case update and dismissal of VMF and dismissal of certain causes of action for SFMC (.1); draft email to Dentons' Verity Team re the same and prepare update to Verity Litigation Management Chart re dismissal of VMF (.1).
05/22/20	K. Murphy	0.40	166.60	B190	/ Basulto / Prepare new case summary to add new matter to Verity Litigation Management Charts (.2); analyze LA Superior Court websites to determine upcoming court dates and prepare update to Verity Deadline Chart with dates for trial and Final Status Conference (.1); analyze email from John Moe confirming completion of letter to plaintiffs' counsel re stay (.1).
05/22/20	K. Murphy	0.10	41.65	B190	/ Harris / Analyze email from Elina Tilman enclosing complaint and case assessment, and draft email to Derry Kalve re the same.
05/22/20	K. Murphy	0.40	166.60	B190	/ Harris / Attend telephone call with John Moe, Sam Maizel, Elina Tilman, and An Ruda re case status and upcoming mediation.
05/22/20	K. Murphy	0.10	41.65	B190	/ Basulto / Draft email to Kathryn requesting preparation of Notice of Automatic Stay.
05/22/20	K. Murphy	0.20	83.30	B190	/ Basulto / Confer with John Moe re filing of new complaint for pre-petition claim (.1); and analyze and respond to email from Karen Chapman confirming preparation of Notice of Stay and letter to Plaintiffs' counsel (.1).
05/22/20	K. Murphy	0.20	83.30	B190	/ CT Corp - Basulto- / Analyze notice from CT Corporation of Summons and Complaint to SFMC and analyze complaint and summons (.1); and draft emails to Karen Chapman re notice of case and John Moe to discuss pre-petition allegations (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Basulto / Analyze and respond to email from Elina Tilman re plan for KFM to prepare notice email to Verity Team re service of process of Summons and Complaint to Verity Team.
05/22/20	J.A. Moe, II	0.10	59.93	B190	/Federico Fuentes v. St. Francis/ Review E-Mail on and review status of dismissal of VHS with St. Francis remaining as a Defendant.
05/22/20	J.A. Moe, II	0.40	239.70	B190	/Leonard Harris v. St. Francis/ /Telephone conference with An Ruda and Elina Tilman, on preparing for the upcoming Mediation, reviewing the background on the case and the defendants.
05/22/20	J.A. Moe, II	0.50	299.63	B190	/Basulto v. St. Francis/ Preliminarily review the newly served Complaint; prepare draft of letter to Attorney Thomas E. Donahue interposing the automatic stay in regard to allegations that assert causes of action that arose in 2012 (.30); review and revise the draft letter (.10); confirm with Kathryn Howard the filing of a Notice Of Stay (.10).
05/22/20	K. Murphy	0.20	83.30	B190	Analyzed email from Elina Tilman enclosing Complaint and Exposure Analysis (.1); and analyzed the enclosed documents (.1).
05/26/20	K. Murphy	0.10	41.65	B190	/ Basulto / Analyze and respond to email from Laurie Soledad re new complaint.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Eddie Jones v. St. Francis/ Review the Subpoena for records in regard to Workers Compensation Case, and E-Mail to Karleen Murphy on request.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Leonard Harris v. St. Francis/ Review notice on Status Conference and E-Mail to Karleen Murphy on upcoming hearing.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review Notice of upcoming Non Appearance Case Review on June 24th and E-Mail to Karleen Murphy on status; telephone call with Karleen Murphy on preparing a Report for the Court.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Leroy Scott v. Martin Luther King Hospital/ Review Subpoena for records and review An Ruda's E-Mail on interposing Objection to Subpoena.
05/26/20	J.A. Moe, II	0.20	119.85	B190	/Mariabelen Basulto v. St. Francis/ Review and revise -- with one change and one addition -- the letter to Attorney Thomas Donahue on imposition of the automatic stay.
05/26/20	J.A. Moe, II	0.10	59.93	B190	/Leatrice Jones v. St. Francis/ Review Subpoena for records served on St. Francis in regard to Workers Compensation Claim, and E-Mail to Karleen Murphy.
05/26/20	K.M. Howard	0.20	50.15	B190	Analysis of email and attached letter to plaintiff's counsel in Basulto v. St. Francis Medical Center.
05/26/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze and respond to email from Karen Chapman enclosing case summary and analyze summary.
05/26/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen / Draft status conference statement and email to John Moe for review of the same.
05/26/20	S. Maizel	3.00	2,400.00	B190	Revising motion re SCFHP offsets.
05/26/20	K. Murphy	0.10	41.65	B190	/ Natalie Nguyen / Confer with John Moe re status of June 23, 2020 Non-Appearance Case Review re Bankruptcy.
05/28/20	J.A. Moe, II	0.10	59.93	B190	/Leroy Scott v. Martin Luther King Hospital/ Review Subpoena and E-Mail to Karleen Murphy on additional Subpoena.
05/28/20	J.A. Moe, II	0.10	59.93	B190	/Aida Iniguez v. St. Francis/ Review Attorney Carol Badis' Report (addressed to Karen Chapman) on the current status of the case.
<b>Subtotal</b>		<b>12.70</b>	<b>6,565.49</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B200 - Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	K. Holland	1.50	1,200.00	B200	Review location and image release agreement related to The Voice production at St. Francis (1.0); prepare email with analysis of issues and recommended negotiation areas to team (.5)
05/01/20	S. Maizel	0.60	480.00	B200	Review and respond to emails re The Voice concert on lawn (.5); telephone conference with T. Moyron re same (.1).
05/01/20	T. Moyron	0.50	299.63	B200	Analyze email from H. Levy-Biehl re St. Francis re The Voice (.1); prepare email response (.1); conference call with R. Adcock re same and related matters (.3).
05/05/20	T. Moyron	0.20	119.85	B200	Analyze email and comments on image release.
05/05/20	K. Holland	2.20	1,760.00	B200	Review email from T. Moyron regarding The Voice Location Agreement and changes to plans related to performance (.1); review email from T. Moyron regarding Image Release and Video Release (.1); review Video Release and provide comments to same to T. Moyron, including questions regarding clearance of performance and music rights (1.2); review Image Release and provide comments to same (.5); call with T. Moyron regarding release issues (.3)
<b>Subtotal</b>		<b>5.00</b>	<b>3,859.48</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B210 - Business Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	S. Maizel	0.30	240.00	B210	Review and respond to emails re Medi-Cal audit.
	<b>Subtotal</b>	<b>0.30</b>	<b>240.00</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	C. Doherty, Jr.	0.10	37.40	B220	Respond to email from client re Rabbi Trust Motion
	<b>Subtotal</b>	<b>0.10</b>	<b>37.40</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B260 - Board of Directors Matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	T. Moyron	0.80	479.40	B260	Prepare email to Board re Prime (.1); conference call with Board (.7).
05/26/20	S. Maizel	0.30	240.00	B260	Telephone conference with R. Adcock re SFMC Board meeting.
	<b>Subtotal</b>	<b>1.10</b>	<b>719.40</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	J.A. Moe, II	0.30	179.78	B310	/UNAC/ Review the Withdrawal, and telephone call to and exchange E-Mails with Pamela Chandran on Withdrawal (.20); telephone call with Elina Tilman on Withdrawal and background on Claims filed and recognized (.10).
05/07/20	J.A. Moe, II	0.20	119.85	B310	/UNAC/ Review status on resolution of Claim and update Withdrawal to send to Pamela Chandran (.1); E-Mail to Ms. Chandian transmitting the Withdrawal and requesting of executed Withdrawal (.1).
05/15/20	J.A. Moe, II	0.20	119.85	B310	/UNAC/ Review with Elina Tilman the necessity to obtain the execution of the Withdrawal Of Claim, and E-Mail Withdrawal to Ms. Tilman (.10); obtain return of executed Withdrawal and internal conference on date and authority to file the Withdrawal (.10).
<b>Subtotal</b>		<b>0.70</b>	<b>419.48</b>		



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	S. Alberts	0.40	320.00	EMP	SFMC. Communicate with A. Ruda about responding to UNAC RFIs.
05/01/20	S. Maizel	2.20	1,760.00	EMP	Video meeting with UNAC re CBA and section 1113 proposal.
05/01/20	S. Maizel	2.30	1,840.00	EMP	Video meeting with SEIU re CBA and section 1113 proposal.
05/01/20	S. Maizel	0.50	400.00	EMP	[REDACTED]
05/03/20	S. Alberts	0.20	160.00	EMP	SFMC 1113. Communicate with A. Ruda and S. Maizel about upcoming unions and Prime meetings.
05/04/20	S. Alberts	0.20	160.00	EMP	SFMC. 1113 Communications about upcoming union meeting and coverage.
05/05/20	S. Alberts	1.00	800.00	EMP	SFMC 1113. Meeting with UNAC (.4) and follow up (.1); meeting with SEIU (.5).
05/05/20	S. Maizel	1.50	1,200.00	EMP	Telephone conference with SEIU, Prime, etc. re CBA issues.
05/06/20	S. Alberts	3.30	2,640.00	EMP	[REDACTED] [REDACTED] communicate with BZBM about obtaining last Prime offer and related discovery demands for 1113 motion (.3); confer with Prime and UNAC (.3); receive SEIU press release and forward to Dentons team (.1) and follow up communication with Prime (.3); follow up call between Prime and UNAC (.9); follow up with client team regarding UNAC and SEIU disclosures (.7); [REDACTED]
05/06/20	S. Maizel	0.60	480.00	EMP	[REDACTED]
05/06/20	S. Maizel	0.60	480.00	EMP	Review and respond to emails re CBA and 1113 motions (.4); telephone conference with Casey Douherty re same (2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	S. Maizel	0.50	400.00	EMP	Review and respond to emails re SEIU negotiations with Prime.
05/06/20	C. Doherty, Jr.	7.90	2,954.60	EMP	Attention to and respond to Emails re SFMC Process and Assignment of Motion (1.0); call with Mr. Maizel re assignment (.1); prepare 1113 Motion re SFMC (6.8)
05/06/20	C. Montgomery	0.30	240.00	EMP	
05/07/20	C. Doherty, Jr.	4.50	1,683.00	EMP	Call with Ms. Moyron and perform follow up research re 1113 bargaining (.5); prepare 1113 motion re St Francis (4.0)
05/07/20	S. Alberts	2.80	2,240.00	EMP	
05/07/20	S. Maizel	0.50	400.00	EMP	
05/07/20	S. Maizel	0.50	400.00	EMP	Telephone conference with Prime representatives re labor negotiations.
05/07/20	S. Maizel	0.30	240.00	EMP	Telephone conference with T. Moyron re labor negotiations.
05/08/20	C. Doherty, Jr.	0.10	37.40	EMP	Review email correspondence re 1113 SFMC Motion
05/08/20	S. Maizel	0.60	480.00	EMP	Telephone conference with T. Moyron re labor negotiations.
05/08/20	S. Maizel	0.30	240.00	EMP	
05/08/20	S. Maizel	1.40	1,120.00	EMP	Meeting with SEIU re Prime transaction (x2).

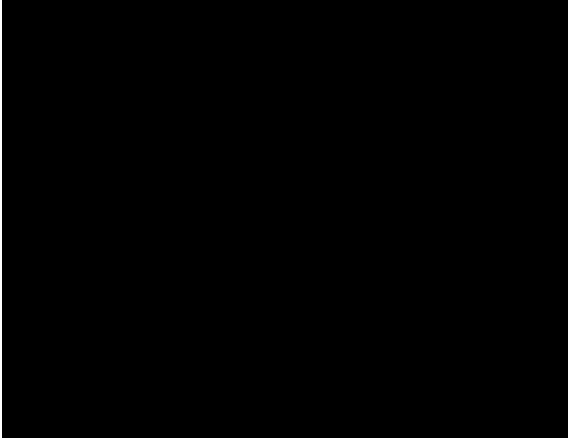
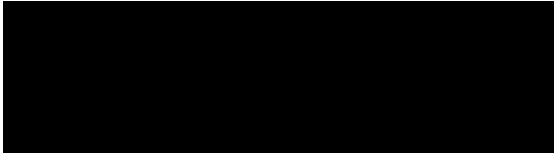
St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/08/20	S. Alberts	2.20	1,760.00	EMP	1113. Review MOR signature page and provide confirmation for state in response to union inquiry (.2), receive and respond to P. Chadwick's inquiry on information passed to unions from Prime (.1), follow up on request for info for 1113 Motion (.1) and follow up (.1) and call with L. Fernandez regarding same (.2), review and consider SEIU (.1) and UNAC (.1) responses to Prime letters and follow up with co-counsel (.2) and communications with co-counsel on proper response to confidentiality issue (.2), confer with co-counsel about new information request and answer (.2), review and respond to answers to information questions on PTO and severance (.4) and follow up (.3).
05/08/20	S. Alberts	0.10	80.00	EMP	SFMC 1113. Review scheduling order and confirm briefing schedule.
05/09/20	S. Alberts	0.60	480.00	EMP	
05/11/20	S. Alberts	1.50	1,200.00	EMP	
05/11/20	T. Moyron	0.40	239.70	EMP	Conference call with S. Alberts, et al. re labor matters.
05/12/20	T. Moyron	0.40	239.70	EMP	Analyze matters related to section 1113 and proposal.
05/12/20	S. Alberts	2.00	1,600.00	EMP	SFMC. Review background, draft and circulate 1113 proposal.
05/12/20	C. Doherty, Jr.	0.10	37.40	EMP	Review emails re SFMC 1113 process
05/12/20	S. McCandless	0.20	159.80	EMP	

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/13/20	S. McCandless	2.30	1,837.70	EMP	
05/13/20	S. Alberts	1.80	1,440.00	EMP	1113. Receive and incorporate comments to SEIU communication, convert SEIU email into formal letter, draft UNAC 1113 Proposal and circulate for review and approval (1.4); finalize letters and send to UNAC (.2) and SEIU (.2).
05/13/20	T. Moyron	0.60	359.55	EMP	Conference call with R. Adcock re labor matters.
05/13/20	T. Moyron	0.40	239.70	EMP	Analyze UNAC correspondence (.2); and related correspondence (.2).
05/13/20	C. Doherty, Jr.	0.50	187.00	EMP	Provide comments re 1113 Proposal re SEIU and UNAC
05/14/20	S. Alberts	0.20	160.00	EMP	SFMC. Communications regarding 1113 productions.
05/15/20	T. Moyron	0.20	119.85	EMP	Analyze letter from J. Kohanski re UNAC (.1); conference call with A. Ruda (.1).
05/16/20	C. Doherty, Jr.	1.10	411.40	EMP	
05/17/20	C. Doherty, Jr.	2.80	1,047.20	EMP	Prepare 1113 Motion re comments from Mr. Alberts to draft.
05/17/20	S. Alberts	5.20	4,160.00	EMP	SFMC 1113. Communicate with A. Ruda about status of future discussions with Prime and UNAC (.3); review, revise, add toggle provisions (for UNAC and SEIU versions) expand and circulate for review (4.7) and follow up (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	C. Doherty, Jr.	3.90	1,458.60	EMP	Prepare 1113 Motions re comments Ms. Moyron via phone call (3.5); review and add comments to 1113 letter (.4)
05/18/20	T. Moyron	4.30	2,576.78	EMP	Analyze and prepare Section 1113 motions (3.4); analyze matters related to APA rejection and documents (.5); exchange emails with Dave Ruda, et al., re same (.4).
05/18/20	T. Moyron	2.50	1,498.13	EMP	Analyze UNAC letter(.2); prepare comments to UNAC letter (.3); exchange emails with S. Alberts re UNAC (.2); analyze A. Ruda et al., emails re UNAC (.4); conference call with A. Ruda et al. re labor negotiations (.5); call with Prime et al. re labor matters (.5); followup call with A. Ruda, S. Alberts re labor matters (.4).
05/18/20	T. Moyron	0.20	119.85	EMP	Analyze May 18 UNAC letter.
05/18/20	S. Alberts	5.00	4,000.00	EMP	SFMC Labor. Revise and circulate 1113 Motion to BZBM (.6); draft and circulate letter to UNAC in response to UNAC's letter of May 15 (.8); follow up on letter with co-counsel and made changes (.3); forward to client for approval and obtain approval (.1) and send to UNAC (.1); follow up message from counsel to UNAC (.2); review and provide comments on letter from Prime to UNAC (.3) and follow up (.2); communications on Prime and UNAC issues (.6); conference with BZBM and T. Moyron in advance of call with Prime (.5) and conference with Prime (.5) and follow up with working group on 1113 matters and Prime and UNAC discussions (.4); emails (.2); then conference with S. Sharrer concerning payment of PTO (.2).
05/19/20	T. Moyron	5.20	3,116.10	EMP	Analyze and prepare comments to 1113 motions (3.7); analyze and prepare comments to declarations (.6); correspond with R. Adcock, et al. re same (.4); conference call with G. Gertler re same (.1); analyze J. Richlin email re same (.1); analyze APA (.1); correspond with S. Alberts re motions (.2).


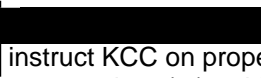
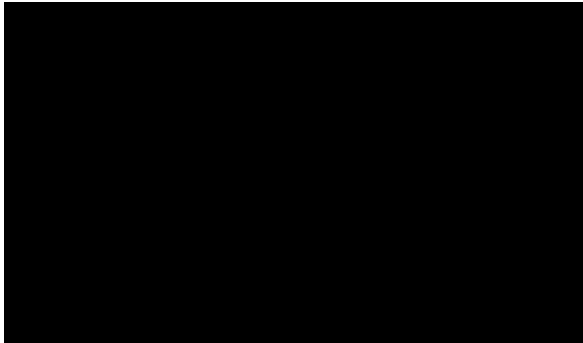
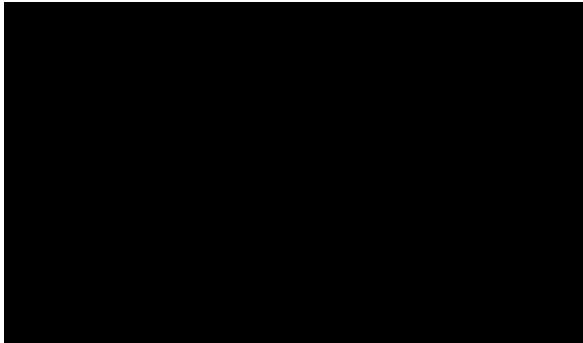
St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/19/20	C. Doherty, Jr.	10.50	3,927.00	EMP	Prepare Rejection Motions and Declarations and Exhibits, including responding to emails, strategy calls, distributing drafts with cover emails, implementing changes and drafting same.
05/19/20	S. Alberts	9.90	7,920.00	EMP	SFMC LABOR. Emails about 1113 declaration (.2); work on and oversee filing of 1113 motions for UNAC and SEIU (7.5); receive, review and respond to letter from UNAC concerning 1113 (1.7); send to co-counsel (.1); receive and incorporate comments (.3) and follow up (.1).
05/19/20	D. Pina	2.00	637.50	EMP	Communications with Team regarding filing of motions to reject collective bargaining agreements with SEIU and UNAC (.3); review draft motions and prepare exhibits to motions for electronic filing (1.); review final motions and prepare for electronic filing (.4); electronically file and distribute copies of papers (.3).
05/19/20	N. Koffroth	2.40	1,203.60	EMP	Draft 1113 motions re UNAC (1.2) and SEIU (1.2)
05/20/20	T. Moyron	0.20	119.85	EMP	Analyze order re 1113 briefing schedule (.1); analyze related emails (.2).
05/20/20	K.M. Howard	0.40	100.30	EMP	Analysis of Debtors' 1113 Motion to Reject Collective Bargaining Agreement with UNAC and reviewed and revised Critical Dates Memorandum accordingly.
05/20/20	K.M. Howard	0.40	100.30	EMP	Analysis of Debtors' 1113 Motion to Reject Collective Bargaining Agreement with SEIU and reviewed and revised Critical Dates Memorandum accordingly.
05/20/20	K.M. Howard	0.40	100.30	EMP	Analysis of Order setting Briefing Schedule on Debtors' Section 1113 Motions and reviewed and revised Critical Dates Memorandum accordingly.
05/20/20	S. Alberts	1.10	880.00	EMP	SFMC 1113. Revise and send letter to UNAC in response to 5/18 inquiry (.2); receive order scheduling 1113 Motion briefing and forward to client, follow up (.3) and send to UNAC, SEIU and Prime (.2); review UNAC bargaining proposals (.4).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	C. Doherty, Jr.	0.70	261.80	EMP	  instruct KCC on proper service re 1113 procedure (.1); address questions from client re filing and 1113 process (.1)
05/20/20	J.A. Moe, II	0.50	299.63	EMP	/UNAC/ in regard to the Withdrawal filed as to UNAC's Claim Number , review the Debtors' Motion Under Section 1113 Of The Bankruptcy Code To Reject Collective Bargaining Agreement With UNAC.
05/21/20	S. McCandless	0.70	559.30	EMP	
05/21/20	A. Shiran	0.60	308.70	EMP	
05/21/20	S. Alberts	1.70	1,360.00	EMP	SFMC 1113. Review "snowball" CBA provisions to understand state of play in UNAC and Prime negotiations (.5); communicate regarding status of UNAC negotiations (.1) follow up call with working group regarding same (.5); communicate with T. Moyron concerning snowball concept and review (.1); review and provide questions concerning most recent "snowball" (.3); receive, review and follow up on SEIU requests for information regarding 1113 Proposal (.2).
05/21/20	C. Doherty, Jr.	0.90	336.60	EMP	Prepare for and Call with Mr. Alberts, Ms. Ruda and Mr. Sharrer re 1113 Process (.6); review precedent re 1113 and potential reply (.3)
05/22/20	S. Alberts	2.20	1,760.00	EMP	SFMC Labor. Receive, review and respond to SEIU press release on CBA rejection (.2); review and draft response to SEIU information inquiry and circulate to C. Doherty for addition of certain materials (1.3); and follow up review and modifications (.5); communicate with S. Sharrer about severance balances (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

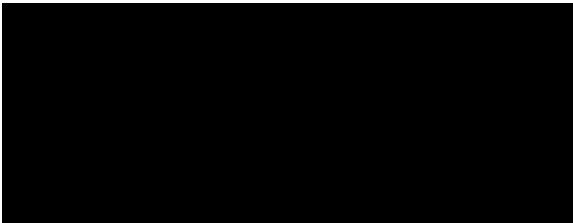
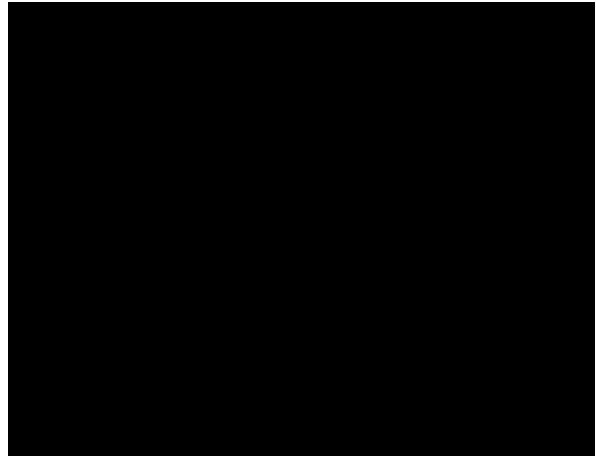
June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	C. Doherty, Jr.	1.50	561.00	EMP	Prepare comments re 1113 information request response (1.1) [REDACTED]
05/23/20	S. Alberts	0.60	480.00	EMP	SFMC 1113. Communicate with co-counsel about responses to SEIU inquiry (.2); made changes (.2); send and receive authority to send to SEIU (.1); send to SEIU (.1).
05/25/20	S. Alberts	0.20	160.00	EMP	SFMC. Communications with A. Ruda about UNAC and SEIU status.
05/25/20	A. Shiran	0.90	463.05	EMP	[REDACTED]
05/25/20	S. McCandless	0.40	319.60	EMP	[REDACTED]
05/26/20	S. McCandless	0.70	559.30	EMP	[REDACTED]
05/26/20	A. Shiran	3.70	1,903.65	EMP	[REDACTED]
05/26/20	T. Moyron	0.50	299.63	EMP	Analyze and prepare comments to employee letter (.3); exchange emails re same (.2).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	S. Alberts	1.30	1,040.00	EMP	Receive and respond to communication from SEIU (.6) and follow up (.2) and send to client for approval (.1); receive approval, made some modifications and send to SEIU (.3); receive and respond to update on UNAC and Prime negotiations and impasse (.1).
05/26/20	T. Moyron	0.40	239.70	EMP	Analyze emails from A. Ruda, S. Alberts regarding requests and responses re labor matters.
05/26/20	C. Doherty, Jr.	3.40	1,271.60	EMP	Provide comments to SEIU Response letter (.4); prepare form of Reply/Update for SFMC 1113 Reply (3.0)
05/26/20	K.M. Howard	0.40	100.30	EMP	Analysis of Stipulation continuing hearing and deadlines concerning Angeles IPA Medical Group cure amounts and reviewed and revised Critical Dates Memorandum accordingly.
05/27/20	S. McCandless	0.70	559.30	EMP	
05/27/20	S. Alberts	1.00	800.00	EMP	SFMC Labor. Review and comment on Prime proposed PR and comments related thereto (.7) and follow up (.1); confer with C. Doherty about report to court on 1113 discussions (.2).
05/27/20	A. Shiran	2.70	1,389.15	EMP	

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/20	C. Doherty, Jr.	4.40	1,645.60	EMP	Prepare 1113 Supplemental Declarations (2.0); Prepare Arguments for 1113 Reply (2.4)
05/28/20	C. Doherty, Jr.	3.90	1,458.60	EMP	Prepare 1113 Supplemental Declarations (.5); Prepare Arguments for 1113 Reply (3.4)
05/28/20	S. McCandless	0.80	639.20	EMP	
05/28/20	S. Alberts	0.70	560.00	EMP	SFMC 1113. Communicate with co-counsel about report to the court (.1) and with client (.1); follow up on report facts and format (.1); communicate with SEIU about extension to respond to brief and potential resolution of issue (.2) and resolve with stipulation (.2).
05/28/20	A. Shiran	1.20	617.40	EMP	
05/29/20	S. Alberts	1.10	880.00	EMP	SFMC Labor. Communicate about press release and changes (.3); Communicate with co-counsel regarding UNAC (.2); and with UNAC (.1); review and approve stipulation that UNAC's filing was timely (.1); communications concerning 1113 report with Prime (.1) and internally (.3).
05/29/20	K.M. Howard	0.20	50.15	EMP	Reviewed and assembled SEIU's opposition to Debtors' rejection motion and prepared email to Verity team regarding same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	A. Shiran	1.90	977.55	EMP	
05/29/20	C. Doherty, Jr.	7.00	2,618.00	EMP	Prepare 1113 Supplemental Declarations (1.4); Prepare Arguments for 1113 Reply, including researching prior objections, 1113 precedent and reviewing and analyzing objections filed by unions (5.6)
05/29/20	S. Maizel	0.60	480.00	EMP	Telephone conference with T. Moyron re Prime public statement and other issues (.4); review and respond to emails re same (.2).
05/29/20	S. McCandless	1.10	878.90	EMP	
05/30/20	C. Doherty, Jr.	0.20	74.80	EMP	Review emails re 1113 process and supplemental declarations
05/30/20	S. Alberts	1.90	1,520.00	EMP	SFMC 1113. Communicate with Prime about next week's hearings (.1); review draft report due Monday (.3) and circulate (.1); communicate with UNAC about Monday settlement discussions (.2); review UNAC and SEIU objections and assess issues for oral arguments (1.2).
05/31/20	S. Alberts	2.90	2,320.00	EMP	SFMC 1113. Confer with Prime in advance of supplemental filing (.7); confer with Working group (.9); email to client on recommendation (.3); follow up call with T, Moyron (.2); draft email to Prime and unions regarding extension for review by co-counsel (.3); receive clearance, modify and send to Prime/UNAC (.2) and Prime/SEIU and follow up with Prime (.2) and UNAC (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/31/20	C. Doherty, Jr.	1.70	635.80	EMP	Calls re 1113 process and strategy, including calls re completing updated report re 1113 process (1.6); review and comment re emails re possible continuance (.1)
05/31/20	T. Moyron	1.00	599.25	EMP	Conference call with Prime, et al. re labor matters (.8); follow up call with S. Alberts (.2).
<b>Subtotal</b>		<b>159.80</b>	<b>95,179.87</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	G. Medina	0.50	146.63	MED/DHCS	Received reviewed and filed Stipulation by Verity Health System of California, Inc. and California Department of Health Care Services Continuing Objection Deadline (0.2); upload order and download e filed copy and send to N. Kroffroth and T. Moyron (0.3).
	<b>Subtotal</b>	<b>0.50</b>	<b>146.63</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2293308

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	58,436.40
B130	Asset Disposition	103,991.50
B140	Relief from Stay/Adequate Protection Proceedings	419.48
B150	Meetings of and Communications with Creditors	160.00
B185	Assumption/Rejection of Leases and Contracts	6,529.37
B190	Other Contested Matters (excl. assumption/rejection motions)	6,565.49
B200	Operations	3,859.48
B210	Business Operations	240.00
B220	Employee Benefits/Pension	37.40
B260	Board of Directors Matters	719.40
B310	Claims Administration and Objections	419.48
EMP	Employee matters	95,179.87
MED/DHCS	Medi-Cal/DHCS Issues	146.63

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	11.20	\$8,960.00
S. Alberts	\$800.00	51.10	\$40,880.00
S. Maizel	\$800.00	51.50	\$41,200.00
S. Martin	\$760.75	0.90	\$684.68
K. Holland	\$800.00	3.70	\$2,960.00
R. Garms	\$603.50	9.30	\$5,612.55
R. Westhoff	\$468.00	12.20	\$5,709.60
S. Libowsky	\$800.00	54.50	\$43,600.00
S. McCandless	\$799.00	6.90	\$5,513.10
T. Moyron	\$599.25	73.20	\$43,865.23
J.A. Moe, II	\$599.25	5.10	\$3,056.27

St. Francis Medical Center  
Invoice #: 2293308

June 28, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K. Murphy	\$416.50	6.90	\$2,873.85
M. Zeefe	\$480.25	4.50	\$2,161.13
A. Shiran	\$514.50	11.00	\$5,659.50
C. Doherty, Jr.	\$374.00	55.20	\$20,644.80
N. Koffroth	\$501.50	62.40	\$31,293.60
A. Dondoyano	\$323.00	3.20	\$1,033.60
D. Cook	\$471.76	10.20	\$4,811.95
E. Kagedan	\$433.50	7.00	\$3,034.50
E. Cobarrubias	\$267.75	0.50	\$133.88
D. Pina	\$318.75	2.00	\$637.50
G. Medina	\$293.25	1.10	\$322.58
K.M. Howard	\$250.75	<u>8.20</u>	<u>\$2,056.18</u>
Totals		451.80	\$276,704.50

Fee Total \$ 276,704.50

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Invoice Total \$ 276,704.50

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2040 E. Mariposa Avenue  
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June 28, 2020

**Invoice No. 2293309**

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

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Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



**DENTONS**

Main Document

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Dentons -- continuing services  
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Suite 2500  
Los Angeles, California 90017-5704

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293309**


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For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	J.A. Moe, II	0.10	59.93	B130	Review Objection to proposed cure amounts filed by Kaiser Medical Foundation, in regard to Seton Medical Center, preserving rights to continue to work toward resolution of the amounts due.
05/05/20	N. Koffroth	1.30	651.95	B130	Draft omnibus stipulation and order re cure objections
05/06/20	J.A. Moe, II	0.10	59.93	B130	Review Stipulation with Vendors on rescheduling date for hearing on resolution of amounts due Vendors on executory contracts and unexpired leases.
05/07/20	S. Maizel	0.10	80.00	B130	Review and respond to emails re CMS offset for 2016 cost report.
05/27/20	C. Montgomery	0.20	160.00	B130	Phone call from D Riley regarding Seton sale timing and Attorney General review timing.
	<b>Subtotal</b>	<b>1.80</b>	<b>1,011.81</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	K.M. Howard	0.20	50.15	B185	Reviewed court's notice setting the assumption/rejection hearing and reconciled same with Critical Dates Memorandum.
05/04/20	K.M. Howard	0.40	100.30	B185	Analysis of the Court's Notice setting Aetna Life Insurance's Assumption Objection for hearing including Aetna's Objection and reviewed and revised Critical Dates Memorandum accordingly.
05/05/20	T. Moyron	0.30	179.78	B185	Analyze notices of various objections re cure issues re Seton.
05/05/20	D. Cook	0.60	283.06	B185	Communications with N Koffroth regarding omnibus cure extension stipulation (.2); analysis regarding composition of same (.4);
05/05/20	K.M. Howard	0.40	100.30	B185	Analysis of Assumption Rejection Objection filed by Kaiser Foundation Hospitals including review of the court's notice of hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/05/20	K.M. Howard	0.40	100.30	B185	Analysis of Health Net's Assumption Rejection Objection including the court's notice of hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/05/20	K.M. Howard	0.40	100.30	B185	Analysis of UnitedHealthcare's Assumption Objection including the court's notice of hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/05/20	K.M. Howard	0.40	100.30	B185	Analysis of Microsoft Corporation's Assumption Objection including the court's notice of hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/05/20	K.M. Howard	0.40	100.30	B185	Reviewed assumption objections filed by creditors and prepared list of each.

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/20	J.A. Moe, II	0.50	299.63	B185	/Anesthesia Care Consultants/ Telephone call returned to Dr. Viale Christoph, on receipt of Notice and time to respond to amount with amount that is due (.20); prepare E-Mail to Tania Moyron on responding to the Notice (.10); second telephone call with Mr. Christoph on the Notice and likely payment (.20).
05/05/20	J.A. Moe, II	0.10	59.93	B185	Review the Objection of Health Net of California, Inc., to proposed cure amounts on contracts, in regard to Seton Medical Center.
05/06/20	J.A. Moe, II	0.10	59.93	B185	Review Objection Of Parallon Revenue Cycle Service, Inc., To Proposed Assumption And Assignment Of Executory Contract, in regard to Seton Medical Center.
05/06/20	D. Cook	2.80	1,320.93	B185	Communications with N Koffroth regarding omnibus cure extension stipulation (.4); analysis regarding composition of same (2.4).
05/06/20	J.A. Moe, II	0.10	59.93	B185	Review the Objection Of Cigna Healthcare To Proposed Assumption And Assignment Of Executory Contracts, related to Seton Medical Center.
05/06/20	J.A. Moe, II	0.10	59.93	B185	Review the Objection Of Hooper Healthcare To Proposed Assumption And Assignment Of Executory Contracts, as it relates to Seton Medical Center (and the Debtors' other four Hospitals).
05/06/20	J.A. Moe, II	0.10	59.93	B185	Review Objection Of Anupam Aditi To Designated "Cure Amount" in Debtor's Notice To Counterparties To Executory Contracts, in regard to Seton Medical Center.
05/06/20	K.M. Howard	0.40	100.30	B185	Analysis of Parallon's objection to proposed assumption and assignment of contract and the court's notice of setting hearing and reviewed and revised Critical Dates Memorandum accordingly.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	K.M. Howard	0.40	100.30	B185	Analysis of Cigna Healthcare and Life Insurance Company's assumption objection including court's notice of setting hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/06/20	K.M. Howard	0.40	100.30	B185	Analysis of Hooper Healthcare Consulting's objection to proposed assumption and assignment of contract including the court's notice of setting hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/06/20	K.M. Howard	0.40	100.30	B185	Analysis of Health Plan of San Mateo's assumption objection including the court's notice of setting hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/06/20	K.M. Howard	0.40	100.30	B185	Analysis of Anupam Aditi's assumption objection including the court's notice of setting hearing and reviewed and revised Critical Dates Memorandum accordingly.
05/06/20	K.M. Howard	0.50	125.38	B185	Analysis of the Stipulation Continuing Hearing and Related Deadlines pertaining to Cure Objections and reviewed and revised Critical Dates Memorandum including revision to list of counterparties included in Stipulation.
05/06/20	N. Koffroth	5.70	2,858.55	B185	Draft stipulation and order re cure objections
05/07/20	K.M. Howard	0.40	100.30	B185	Reviewed and revised list of creditors filing assumption objections.
05/07/20	J.A. Moe, II	0.10	59.93	B185	Review Limited Objection And Reservation Of Rights Of Health Plan Of San Mateo To Proposed Cure Amount On Assumption And Assignment Of Executory Contract.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/07/20	J.A. Moe, II	0.70	419.48	B185	In regard to the sale of Seton Medical Center, review multiple E-Mails on obtaining list of EPL Claims (.10); telephone call with Karleen Murphy on Exhibit identifying EPL Claims (.10); telephone call with Ms. Murphy, Luzann Fernandez and Elina Tilman on CNA Case (.20); review new proposed Exhibit (but related only to EPL Claims), and confer with Karleen Murphy on reformatting, and review the reformatted Exhibit (as to EPL Claims) (.20); review E-Mails confirming receipt of the EPL Exhibit and response to Karen Chapman's inquiry (.10).
05/07/20	J.A. Moe, II	0.10	59.93	B185	Telephone call returned to Lisa Lenhar on Varian Medical Systems, Inc., Ms. Lenhar's receipt of the Notice To Counterparties, and discussion of the purpose of the Notice and impact on Varian.
05/08/20	K.M. Howard	0.40	100.30	B185	Analysis of Order Approving Stipulation Continuing Hearing and Related Deadlines regarding Cure Amounts and Other Assumption Issues, reconciled to Stipulation and reviewed and revised Critical Dates Memorandum accordingly.
05/11/20	N. Koffroth	0.20	100.30	B185	Draft stipulation continuing Cigna cure objection re Seton sale
05/13/20	K.M. Howard	0.40	100.30	B185	Analysis of the Stipulation continuing hearing and related deadlines regarding Cigna's cure objections and reviewed and revised Critical Dates Memorandum accordingly.
05/14/20	K.M. Howard	0.40	100.30	B185	Analysis of the court's order approving the stipulation continuing related deadlines and hearing pertaining to Cigna's cure objections and reviewed and revised Critical Dates Memorandum accordingly.
05/18/20	K.M. Howard	0.40	100.30	B185	Analysis of Abbott Laboratories' Assumption Objection and the court's notice setting the matter for hearing and reviewed and revised Critical Dates Memorandum accordingly.

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	K.M. Howard	0.30	75.23	B185	Analysis of the court's notice setting the assumption objection hearing and reconciled same to Critical Dates Memorandum.
05/18/20	J.A. Moe, II	0.20	119.85	B185	Review Abbot Laboratories' and Abbot Rapid Diagnostics' objections to the proposed cure amounts and preliminary objections to proposed assumption and assignment of executory contracts.
05/18/20	J.A. Moe, II	0.10	59.93	B185	Review Objection And Reservation Of Rights Of Cardinal Healthcare 200, LLC, As To Cure Amounts Set Forth In Notice To Counterparties As To Executory Contracts That The Debtors May Assume And Assign Related to Seton Medical Center.
05/19/20	K.M. Howard	0.30	75.23	B185	Analysis of GE's assumption objections and reconciled same with hearing on Critical Dates Memorandum.
05/19/20	K.M. Howard	0.30	75.23	B185	Analysis of Smith & Nephew's assumption objection and reconciled same with hearing in Critical Dates Memorandum.
05/19/20	K.M. Howard	0.30	75.23	B185	Analysis of Scan Health's responsive statement to notice to counterparties and reconciled same to hearing dates in Critical Dates Memorandum.
05/19/20	K.M. Howard	0.30	75.23	B185	Analysis of 3M's assumption objection to Motion to Sell Seton and reconciled hearing date to Critical Dates Memorandum.
05/19/20	D. Cook	1.30	613.29	B185	Draft cure objection stipulation (1.1); analysis regarding counterparties to same (.2);
05/19/20	J.A. Moe, II	0.20	119.85	B185	Review Objection Of GE HFS, LLC, To Proposed Assumption And Assignment Of Lease And Cure Obligations Pursuant To Notice To Counterparties To Executory Contracts And Unexpired Leases Of The Debtors That May Be Assumed And Assigned Related To Seton Medical Center.
05/19/20	J.A. Moe, II	0.10	59.93	B185	Review Smith & Nephews, Inc.'s Limited Objection To Proposed Cure Amounts For Assumed Executory Contracts, related to Seton Medical Center.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/19/20	J.A. Moe, II	0.10	59.93	B185	Review 3M Corporation's Objection To Assumption And Assignment Of Executory Contact, related to Seton Medical Center.
05/20/20	D. Cook	4.40	2,075.74	B185	Analysis and composition regarding omnibus cure extension stipulation (3.9); communications with N Koffroth regarding same (.5);
05/20/20	N. Koffroth	1.20	601.80	B185	Draft stipulation and order re cure objections and communications with counsel to counterparties re the same
05/20/20	J.A. Moe, II	0.10	59.93	B185	Review Response Of SCAN Health Plan To Notice To Counterparties To Executory Contracts And unexpired Leases Of The Debtors That May Be Assumed And Assigned.
05/20/20	J.A. Moe, II	0.20	119.85	B185	Review Limited Objection And Reservation Of Rights Of AT&T Corp, ATT Services, Inc., And Their Affiliates To The Debtors' Notice To Counterparties To Executory Contracts And Unexpired Leases Of The Debtors The May Be Assumed And Assigned Related to Seton Medical Center.
05/20/20	J.A. Moe, II	0.10	59.93	B185	Review Blue Shield Of California's Objection To Cure Amount Stated In Debtors' Notice To Counterparties To Executory Contracts And Unexpired Leases Of The Debtors The May Be Assumed And Assigned Related To Seton Medical Center.
05/21/20	N. Koffroth	0.80	401.20	B185	Draft omnibus stipulation and order re cure objections and communications with counsel to counterparties re same
05/21/20	D. Cook	1.10	518.94	B185	Analysis and composition regarding omnibus cure extension stipulation (.9); communications with N Koffroth regarding same (.2);
05/21/20	K.M. Howard	0.50	125.38	B185	Analysis of the Second Stipulations (x2) and Orders(2) approving same continuing the DHCS and DHHS deadlines and hearings on the transfer of Medi-Cal and Medicare Provider Agreements and reviewed and revised Critical Dates Memorandum accordingly.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/20	K.M. Howard	0.40	100.30	B185	Analysis of the Second Omnibus Stipulation to continue hearing and deadlines regarding cure amounts and assumption issues and reviewed and reviewed Critical Dates Memorandum.
05/26/20	K.M. Howard	0.40	100.30	B185	Analysis of Stipulation to extend hearing and related deadlines pertaining to cure objections filed by Cigna and reviewed and revised Critical Dates Memorandum accordingly.
05/26/20	K.M. Howard	0.30	75.23	B185	Analysis of Order approving Stipulation to extend hearing and related deadlines pertaining to cure objections filed by Cigna and reviewed and reconciled same to Critical Dates Memorandum.
<b>Subtotal</b>		<b>31.60</b>	<b>13,309.10</b>		



Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena- Los Robles Regional Medical Center et al v. Kaiser. / Analyze CT Corporation's two separate notices of documents served and analyzed documents (.1); and analyzed email from Elina Tilman to Verity Team enclosing the same with summary for required action (.1).
05/06/20	J.A. Moe, II	0.20	119.85	B190	/Reyes - Hernandez v. Seton/ Review notice regarding the upcoming Case Management Conference, and E-Mail to Karleen Murphy on review (.10); review with Karleen Murphy on expanded updated Statement on sales of Hospitals (.10);
05/06/20	K. Murphy	0.20	83.30	B190	/ Reyes-Hernandez / Analyze and respond to email from John Moe re case status and upcoming Case Management Conference (.1); review court website to confirm 6/12/20 matter remains on calendar and review prior Status Conference Statement re Bankruptcy as this particular judge requires detailed reports and draft email to John Moe re preparation of detailed report. (.1).
05/06/20	K. Murphy	0.10	41.65	B190	/ Reyes-Hernandez / Telephone call re John Moe re court's requirement for detailed bankruptcy report to prepare for drafting the same.
05/06/20	K. Murphy	1.00	416.50	B190	/ Reyes-Hernandez / Prepare for drafting long version of status conference report regarding bankruptcy per court order by analyzing Bankruptcy docket for recent court orders re hospitals for updates in report and analyzed orders(.6); and prepared updated draft of status conference statement (.3); and drafted email to John Moe enclosing draft for review. (.1).
05/11/20	J.A. Moe, II	0.10	59.93	B190	/Reyes-Hernandez v. Seton/ Review updated Status Report and telephone call with Karleen Murphy on purchasers.
05/11/20	K. Murphy	0.10	41.65	B190	/ Reyes-Hernandez / Analyze and respond to email from John Moe re case status.

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	J.A. Moe, II	0.40	239.70	B190	/Reyes - Hernandez v. Seton/ Review Orders on sale of St. Francis and St. Vincent, in regard to completing the Case Management Report on status of the sales of four Hospitals (.30); telephone call to Karleen Murphy on completing the Report (.10).
05/13/20	J.A. Moe, II	0.10	59.93	B190	/Reyes Hernandez v. Seton/ Review notice of upcoming continued hearing on June 12th and E-Mail to Karleen Murphy.
05/14/20	K. Murphy	0.10	41.65	B190	/ Reyes-Hernandez / Telephone call with John Moe to discuss initial edits to draft of Status Conference Statement re Bankruptcy - long form as required by the court.
05/14/20	K. Murphy	0.60	249.90	B190	/ Reyes-Hernandez / Review Bankruptcy Court orders 4530, 4511 and 4634 per instruction to prepare revisions to draft of Status Conference Statement Re Bankruptcy (long version per court order) as directed by John Moe (.2) further confer with John Moe re questions as to content of above orders (.2); and prepare second draft of statement for John Moe review (.2).
05/14/20	J.A. Moe, II	0.90	539.33	B190	/Reyes - Hernandez v. Seton/ Confer with Karleen Murphy on information from Orders for reference in the revised and updated Case Management Report, as it relates to the sale of St. Vincent and St. Francis (.10); conference with Karleen Murphy on correcting the contents of the Case Management Conference Report (.30); second call with Ms. Murphy on sale of St Vincent (.10); additional call with Ms. Murphy on St. Vincent's purchasers (.10); review revised Statement and telephone call with Ms. Murphy on five minor revisions (.20); telephone call returned from Hope Levy-Biehl on purchaser and Attorney General review (.10).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	K. Murphy	0.10	41.65	B190	/ Reyes-Hernandez / Telephone call with John Moe to call with Hope Levy-Biehl to confirm hospital purchaser information to finaluze draft of Status Conference Statement re Bankruptcy - long form as required by the court.
05/18/20	J.A. Moe, II	0.10	59.93	B190	/Reyes - Hernandez v. Seton/ Review with Karleen Murphy change in the Case Management Conference in regard to explaining the sales of Hospitals to purchasers.
05/19/20	J.A. Moe, II	0.30	179.78	B190	/Reyes Hernandez v. Seton/ Confer with Karleen Murphy on completing the Case Management Conference Statement, discussing terms to be included in the Statement (.10); review the Statement and telephone call to Ms. Murphy discussing revision of two sentences, then completing and filing the Statement, and noting the scheduling of the June 12th hearing (.20).
05/19/20	K. Murphy	0.40	166.60	B190	/ Reyes-Hernandez / Further confer with John Moe re required revisions to draft of Status Conference Statement Re Bankruptcy (long version per court order) (.2); and prepare further edits and draft email to John Moe for further review. (.2).
05/19/20	K.M. Howard	0.40	100.30	B190	Analysis of Status Conference Statement in Reyes-Hernandez v. Seton Medical Center and reviewed and revised Critical Dates Memorandum accordingly.
05/22/20	K. Murphy	0.50	208.25	B190	/ Castro - CT Corp/ Analyze CT Corp notice of summons and complaint and analyze email from Karen Chapman re the same (.1); analyze complaint and research San Mateo Superior Court website to determine if case management conference is set (.2); prepare update to Verity Litigation Management Chart and Deadline Chart (.1); and analyze and respond to email from John Moe re case status (.1).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	K. Murphy	0.10	41.65	B190	/ Castro - CT Corp/ Analyze and respond to email from Elina Tilman re acknowledgment of CT Corp summons and complaint, analyze notice from CT Corp requesting acknowledgment, and enter CT Corp database to confirm acknowledgment.
05/26/20	K. Murphy	0.10	41.65	B190	/ Reyes-Hernandez / Analyze San Mateo Superior Court Website to determine status of June 12, 2020, Status Conference.
<b>Subtotal</b>		<b>6.00</b>	<b>2,816.50</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/13/20	K.M. Howard	0.30	75.23	B310	Analysis of Health Net of California's Amended Application for Allowance of Administrative Expense Claim Against Seton Medical Center to determine related deadlines.
	<b>Subtotal</b>	<b>0.30</b>	<b>75.23</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	A. Shiran	6.10	3,138.45	EMP	

05/01/20	T. Moyron	0.80	479.40	EMP	
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05/01/20	S. McCandless	2.80	2,237.20	EMP	
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Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/02/20	S. McCandless	0.40	319.60	EMP	
05/02/20	A. Shiran	1.00	514.50	EMP	
05/04/20	S. McCandless	0.90	719.10	EMP	
05/04/20	S. Alberts	0.10	80.00	EMP	Seton. 1113 Communication about meeting with purchaser and union.
05/04/20	A. Shiran	0.60	308.70	EMP	
05/14/20	S. Alberts	0.30	240.00	EMP	
05/15/20	S. Alberts	0.30	240.00	EMP	
05/18/20	S. Alberts	0.20	160.00	EMP	Labor. Conference with T. Moyron regarding Seton sale and 1113 issues.
05/19/20	S. Maizel	0.60	480.00	EMP	Telephone conference with AHMC representatives re CBA issues (.4); telephone conference with R. Adcock, etc. re same (.2).
05/19/20	S. Alberts	1.20	960.00	EMP	Seton Labor. Receive, review and comment on timeline (.2); APA and assess labor provisions and forward thought on structure (.3); conference with AHMC about union issues (.5); conference with co-counsel (.2).
05/19/20	T. Moyron	0.80	479.40	EMP	Conference call with AHCM re CBAs (.3); conference call with P. Chadwick, et al. re same (.4); analyze chart re same (.1).

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	J.A. Moe, II	0.40	239.70	EMP	Review Debtor's Motion Under Section 1113 Of The Bankruptcy Code To Reject Collective Bargaining Agreement With SEIU.
05/22/20	S. Alberts	0.30	240.00	EMP	Seton Labor. Receive and comment on proposed 1113 negotiation and sale closing schedule and next steps.
05/22/20	S. Maizel	0.30	240.00	EMP	Telephone conference with AHMC representatives re CBA issues.
05/26/20	S. Alberts	0.20	160.00	EMP	Seton 1113. Communicate regarding 1113 negotiations.
05/27/20	S. Alberts	2.10	1,680.00	EMP	Seton Labor. Review materials in advance of conference with Seton purchaser (.2); confer with purchaser about CBA discussions and 1113 process (1.9).
05/28/20	S. Alberts	0.10	80.00	EMP	Seton 1113. Communicate with co-counsel about union meetings with purchaser.
05/29/20	S. Alberts	0.30	240.00	EMP	Seton Pension. Communication about Local 39 obligation (.1); communications about meeting dates (.2).
05/30/20	S. Alberts	0.30	240.00	EMP	Seton. Pension. Confer with S. Sharrer Local 39 multiemployer pension.
<b>Subtotal</b>		<b>20.10</b>	<b>13,476.05</b>		



Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/20	S. Maizel	0.40	320.00	MED/DHCS	Review and respond to emails re DHCS settlement proposal (.2); revise settlement proposal (.2).
05/20/20	S. Maizel	0.60	480.00	MED/DHCS	Review and revise settlement proposal with DHCS (.3); review and respond to emails re same (.3).
05/20/20	K.M. Howard	1.50	376.13	MED/DHCS	Analysis of Debtors' Settlement Agreement with DHCS including review of docket and insertion of cites and revision of Settlement Agreement (.8); email exchange with S. Maizel regarding same (.1); reviewed proofs of claim to determine if DHCS filed a \$31 million claim (.3); prepared email to S. Maizel regarding findings (.1); further email exchanges with S. Maizel regarding DHCS pleadings filed in January 2019 and reviewed docket regarding same (.2).
05/21/20	T. Moyron	1.00	599.25	MED/DHCS	Analyze and prepare comments to Medi-Cal settlement (.8); analyze S. Maizel, et al. emails re same (.2).
05/21/20	S. Maizel	0.50	400.00	MED/DHCS	Review and revise stipulation with DHCS and forward to Ken Wang.
05/22/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to email from K. Wang re settlement proposal.
05/28/20	S. Maizel	0.80	640.00	MED/DHCS	Review DHCS proposed settlement re Medi-Cal provider agreement (.7); email to client re same (.1).
<b>Subtotal</b>		<b>4.90</b>	<b>2,895.38</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2293309

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	1,011.81
B185	Assumption/Rejection of Leases and Contracts	13,309.10
B190	Other Contested Matters (excl. assumption/rejection motions)	2,816.50
B310	Claims Administration and Objections	75.23
EMP	Employee matters	13,476.05
MED/DHCS	Medi-Cal/DHCS Issues	2,895.38
Total This Matter		\$33,584.07

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	0.20	\$160.00
S. Alberts	\$800.00	5.40	\$4,320.00
S. Maizel	\$800.00	3.40	\$2,720.00
S. McCandless	\$799.00	4.10	\$3,275.90
T. Moyron	\$599.25	2.90	\$1,737.83
J.A. Moe, II	\$599.25	5.70	\$3,415.83
K. Murphy	\$416.50	3.50	\$1,457.75
A. Shiran	\$514.50	7.70	\$3,961.65
N. Koffroth	\$501.50	9.20	\$4,613.80
D. Cook	\$471.76	10.20	\$4,811.96
K.M. Howard	\$250.75	<u>12.40</u>	<u>\$3,109.35</u>
Totals		64.70	\$33,584.07

Fee Total \$ 33,584.07

Invoice Total \$ 33,584.07

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2040 E. Mariposa Avenue  
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USA

June 28, 2020

**Invoice No. 2293310**

Matter: 15800425-000010  
Verity Medical Foundation

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\$ 291.55

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**Invoice No. 2293310**


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For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000010  
Verity Medical Foundation

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Julio Rodriguez / Analyze notice of CT Corporation for subpoena of medical records and analyze email from Elina Tilman to Verity Team re the same.
05/06/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Rose Vasquez / Analyze notice of CT Corporation for subpoena of medical records and analyze subpoena.
05/06/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena- Rose Vasquez / Analyze email from Elina Tilman to Verity Team enclosing subpoena for medical records and discussions with counsel re narrowing of the same and further handling recommendations.
05/12/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena Notice / Analyze notice from CT Corp re subpoena for medical records and download subpoena for medical records of Tasha Marie Quinonez treated at SOAR clinic.
05/13/20	K. Murphy	0.20	83.30	B190	/ CT Corp Subpoena Notice / Analyze multiple emails from Elina Tillman, Karen Chapman, and Maria Kwok re the same.
05/14/20	K. Murphy	0.10	41.65	B190	/ CT Corp Subpoena Notice / Analyze email from Elina Tilman advising of settlement of matter and withdrawal of subpoena for medical records of Tasha Marie Quinonez.
<b>Subtotal</b>		<b>0.70</b>	<b>291.55</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2293310

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B190	Other Contested Matters (excl. assumption/rejection motions)	291.55
	Total This Matter	\$291.55

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
K. Murphy	\$416.50	<u>0.70</u>	<u>\$291.55</u>
Totals		0.70	\$291.55
Fee Total	\$	291.55	
Invoice Total	\$	<u>291.55</u>	

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June 28, 2020

**Invoice No. 2293315**

Matter: 15800425-000019  
Verity Holdings, LLC

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Total This Invoice	\$ 2,640.00
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June 28, 2020

**Invoice No. 2293315**

For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000019  
Verity Holdings, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	C. Montgomery	0.20	160.00	B130	Communications with P Saba and J Schlant regarding tax allocation.
05/05/20	C. Montgomery	2.10	1,680.00	B130	Communications with J Schlant regarding Grant Thornton sales tax inquiry (.3); revise Master Lease Agreement and phone call with P Saba re same (1.2); communications with D Galfus re resolution of final payment number (.2) create revised Master Lease invoice history and communications with D Galfus re same and J Schlant re same (.4)
05/07/20	C. Montgomery	0.10	80.00	B130	Communications with P Chadwick and T Moyron re changing payments for NantWorks Master Lease settlement.
05/18/20	C. Montgomery	0.40	320.00	B130	Phone call with P Saba regarding Master lease settlement (.2); communications with T Moyron re same (.2)
05/29/20	C. Montgomery	0.50	400.00	B130	Communications with P Saba regarding Master lease and review Walker account summary (.2); communications with J Schlant re differences in Walker and Verity account schedules (.3)
<b>Subtotal</b>		<b>3.30</b>	<b>2,640.00</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2293315

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	2,640.00
	Total This Matter	\$2,640.00

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	<u>3.30</u>	<u>\$2,640.00</u>
Totals		3.30	\$2,640.00
Fee Total	\$	2,640.00	
Invoice Total	\$	<u>2,640.00</u>	



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June 28, 2020

**Invoice No. 2293311**

Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

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June 28, 2020

**Invoice No. 2293311**

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For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	C. Montgomery	2.20	1,760.00	B130	Communications with P Chadwick and T Conner regarding Put Option under Operating Agreement (1.2); review and revise demand letter re same (1.0)
	<b>Subtotal</b>	<b>2.20</b>	<b>1,760.00</b>		

De Paul Ventures - San Jose Dialysis, LLC  
Matter: 15800425-000012  
Invoice No.: 2293311

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	1,760.00
	Total This Matter	\$1,760.00

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	<u>2.20</u>	<u>\$1,760.00</u>
Totals		2.20	\$1,760.00
Fee Total	\$	1,760.00	
Invoice Total	\$	<u>1,760.00</u>	

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June 28, 2020

**Invoice No. 2293316**

Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

Payment Due Upon Receipt

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\$ 60,411.31

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**Invoice No. 2293316**

For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000020  
 Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
 2:20-ap-01001-ER

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	K.M. Howard	0.30	75.23	APP	Reviewed and assembled Appellants' Reply Brief (.2) and prepared email to Verity Team regarding same (.1).
05/04/20	I. Hsu	0.30	133.88	APP	Review SGM reply for appeal briefing.
05/08/20	S. Martin	1.20	912.90	APP	Review and analyze SGM's reply brief on appeal.
05/12/20	S. Martin	0.30	228.23	APP	Review SGM's assertions in appellate brief and cited bankruptcy court order and communications relating to same.
05/12/20	T. Moyron	0.60	359.55	APP	Analyze matters related to SGM reply brief.
05/12/20	S. Maizel	0.50	400.00	APP	Telephone conference with Paul Ricotta, C. Montgomery, etc. re SGM appeal issues.
05/12/20	M. Zeefe	1.90	912.48	APP	Review SGM reply brief and record below, and emails with team re same (0.7); call with N. Koffroth re same (0.2); draft notice of errata (1.0).
05/13/20	M. Zeefe	0.10	48.03	APP	Emails re draft notice of errata.
05/13/20	C. Montgomery	0.10	80.00	APP	Communications with T Moyron, M Zeefe and S Martin regarding SGM appeal brief.
05/13/20	S. Martin	0.60	456.45	APP	Draft errata regarding appeal brief.
05/14/20	T. Moyron	2.20	1,318.35	APP	Analyze District Court order (.1); conference call with R. Adcock re same (.1); research cases re mootness and vacatur (1.8); analyze emails re same (.2); prepare emails to lenders re order (.1).

Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
Matter: 15800425-000020  
Invoice No.: 2293316

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/14/20	K.M. Howard	0.40	100.30	APP	Analysis of J. Fischers' orders (x6) dismissing the consolidated appeals SGM v. Verity as moot and reviewed and revised Critical Dates Memorandum accordingly.
05/14/20	N. Koffroth	0.80	401.20	APP	Participate in internal call re order dismissing appeals and related briefing
05/14/20	N. Koffroth	0.70	351.05	APP	Research and analyze case law re vacatur
05/14/20	S. Martin	2.30	1,749.73	APP	Further review and edit errata to appeal brief (.2); review and analyze order dismissing appeal and confer with T. Moyron and S. Maizel regarding same (.5); review case law regarding vacatur (1.6).
05/14/20	S. Maizel	0.10	80.00	APP	Telephone conference with T. Moyron re District Court decision finding SGM appeals are moot.
05/14/20	I. Hsu	0.20	89.25	APP	Review order from Judge Fischer.
05/14/20	M. Zeefe	0.30	144.08	APP	Emails re errata (0.1); update same (0.2).
05/15/20	N. Koffroth	2.60	1,303.90	APP	Research and analyze case law re vacatur and related issues in response to District Court order dismissing appeals
05/15/20	S. Martin	0.60	456.45	APP	Communicate with M. Shinderman and T. Moyron regarding response to order on appeal (.4); analysis regarding case deadlines in adversary proceeding based on appellate order (.2).
05/15/20	T. Moyron	0.90	539.33	APP	Conference call with M. Shinderman and S. Martin re DC Orders (.4); analyze case law re dismissal and mootness (.5).
05/15/20	K.M. Howard	0.70	175.53	APP	Analysis of J. Fischer's order issued April 14, 2020 establishing deadlines after entry of orders dismissing the consolidated appeals and reviewed and revised Critical Dates Memorandum accordingly.
05/15/20	K.M. Howard	0.40	100.30	APP	Email exchanges with S. Martin regarding Judge Fischer's rulings (.1); reviewed and assembled requested orders (.2); prepared email regarding same (.1).
05/18/20	N. Koffroth	0.50	250.75	APP	Participate in internal call analyzing issues related to vacatur of orders following dismissal of appeal as moot

Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
Matter: 15800425-000020  
Invoice No.: 2293316

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	N. Koffroth	3.80	1,905.70	APP	Draft internal memorandum regarding vacatur of orders following dismissal of appeal as moot
05/19/20	S. Martin	1.20	912.90	APP	Begin drafting objection to tentative order to vacate.
05/21/20	J.S. Zeman	1.60	877.20	APP	Researched vacatur precedents on dismissal on mootness grounds
05/21/20	M. Zeefe	0.10	48.03	APP	Email from N. Koffroth re vacatur of lower orders.
05/21/20	N. Koffroth	0.70	351.05	APP	Draft objection to tentative ruling vacating orders
05/22/20	S. Martin	0.10	76.08	APP	Communicate with defense team regarding response to vacatur order.
05/22/20	J.S. Zeman	5.50	3,015.38	APP	Researched vacatur and exceptions thereto.
05/23/20	J.S. Zeman	2.70	1,480.28	APP	Reviewed appellate briefs to Judge Fischer.
05/23/20	J.S. Zeman	4.80	2,631.60	APP	Researched vacatur rules in variety of contexts
05/23/20	J.S. Zeman	0.40	219.30	APP	Telephone conference with Ms. Moyron re strategies for Objection to vacatur order.
05/24/20	J.S. Zeman	5.00	2,741.25	APP	Continued researched on vacatur remedy and exceptions thereto
05/24/20	J.S. Zeman	2.60	1,425.45	APP	Drafted memorandum regarding outcome of vacatur research
05/25/20	J.S. Zeman	0.50	274.13	APP	Conference call re vacatur research and strategy with Ms. Moyron, Mr. Maizel, Ms. Martin, Mr. Koffroth
05/25/20	S. Martin	1.10	836.83	APP	Review research regarding vacatur and communicate with defense team regarding same (.4); review stipulation regarding stay of adversary pending appeal for new deadline (.1); strategy call with defense team regarding vacatur issues (.6).
05/25/20	C. Montgomery	0.70	560.00	APP	Participate in phone conference with RAdcock, D Galfus, P Chadwick, T Moyron, S Maizel and H Levy-Biehl regarding status of SGM litigation post appeal dismissal order by Judge Fisher.

Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
Matter: 15800425-000020  
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Date	Timekeeper	Hours	Amount	Task	Narrative
05/25/20	T. Moyron	1.90	1,138.58	APP	Analyze memorandum re vacatur cases (.4); analyze cases cited in briefs (.4); conference call with J. Zeman, et al. (.6); follow up call with S. Martin, et al. (.4); exchange emails re same (.1).
05/25/20	N. Koffroth	0.60	300.90	APP	Internal call re appellate brief re vacatur
05/25/20	S. Maizel	1.60	1,280.00	APP	Telephone conference with Jules Zeman, etc. re SGM Appeals (.5); telephone conference with R. Adcock, BRG, etc. re same (.7); telephone conference with S. Martin and T. Moyron re same (.4).
05/25/20	J.S. Zeman	7.30	4,002.23	APP	Researched law supporting potential objections to vacatur tentative order
05/26/20	S. Martin	0.10	76.08	APP	Email with defense team regarding appeal strategy regarding vacatur.
05/26/20	J.S. Zeman	1.90	1,041.68	APP	Researched Federal Collateral Estoppel for Objections brief
05/26/20	J.S. Zeman	0.90	493.43	APP	Drafted short brief on vacatur in context of no unfair collateral estoppel effect
05/26/20	J.S. Zeman	1.20	657.90	APP	Drafted short brief on no vacatur of interlocutory orders
05/26/20	J.S. Zeman	2.50	1,370.63	APP	Drafted short brief re no vacatur where doctrines of waiver/estoppel prevent determination on the merits
05/26/20	J.S. Zeman	0.70	383.78	APP	Drafted material on equitable considerations and public interest to be weighed for vacatur objection brief introduction
05/26/20	S. Maizel	0.40	320.00	APP	Telephone conference with T. Moyron, S. Martin, etc. re SGM appeal issues.
05/26/20	C. Montgomery	0.10	80.00	APP	Phone call with T. Moyron regarding her conversation with D. Eldan regarding vacatur issue.
05/26/20	N. Koffroth	0.30	150.45	APP	Participate in call with D. Eldan re response to District Court tentative ruling re vacatur
05/27/20	J.S. Zeman	3.20	1,754.40	APP	Researched further authorities on waiver/vacatur for Objections brief.



Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
Matter: 15800425-000020  
Invoice No.: 2293316

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/20	J.S. Zeman	0.40	219.30	APP	Drafted short supplement to section arguing for dismissal instead of vacatur, where the right to appeal is argued to have been waived by Appellant.
05/27/20	C. Montgomery	0.20	160.00	APP	Review D Elden communication re joint brief on vacature question and communications with T Moyron re same.
05/27/20	T. Moyron	1.30	779.03	APP	Finalize response re vacatur.
05/27/20	T. Moyron	2.10	1,258.43	APP	Analyze case law and memoranda re vacatur (.8); prepare response to District Court Order and analyze related matters (1.3).
05/27/20	S. Martin	0.60	456.45	APP	Review briefing inserts for response to tentative decision to vacate underlying orders and confer with defense team regarding same.
05/27/20	N. Koffroth	7.40	3,711.10	APP	Draft opposition to District Court's tentative ruling re vacatur
05/28/20	N. Koffroth	10.30	5,165.45	APP	Draft opposition to District Court's tentative ruling re vacatur
05/28/20	G. Medina	0.40	117.30	APP	Review and file Response To Court's Tentative Decision To Vacate Order and send efile copy to N. Koffroth and T. Moyron in the District Court Case.
05/28/20	C. Montgomery	0.10	80.00	APP	Call with T Moyron regarding brief on vacatur order.
05/28/20	S. Martin	1.10	836.83	APP	Review and comment on response to court's vacatur order and additional research on waiver, and email relating to same.
05/28/20	T. Moyron	3.50	2,097.38	APP	Prepare and finalize brief and further analyze cases re vacatur (2.8); exchange emails with M. Shinderman (.4); exchange emails with D. Eldan (.3).
05/29/20	C. Montgomery	0.30	240.00	APP	Review Appellees' Joint Brief on conditional vacatur of AG Settlement Order and Appellants request to file reply (.3)
05/29/20	S. Maizel	0.10	80.00	APP	Review SGM's response to dismissal order.

Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
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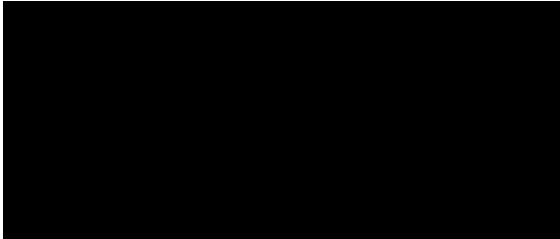
June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	S. Martin	0.30	228.23	APP	Review SGM's request to file response to vacatur brief and confer with T. Moyron regarding same.
05/29/20	K.M. Howard	0.30	75.23	APP	Analysis of SGM's Request to file a Reply Brief (.1); assembled and prepared email to Verity Team regarding same (.1); assembled Appellees' Joint Response to the Court's Decision to Vacate Orders and prepared email to Verity Team regarding same (.1).
05/30/20	I. Hsu	0.40	178.50	APP	Review response to order and request to file reply by appellant.
<b>Subtotal</b>		<b>100.90</b>	<b>56,755.44</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
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June 28, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/18/20	I. Hsu	0.70	312.38	B130	Research and draft jury demand.
05/21/20	S. Martin	0.10	76.08	B130	
05/25/20	S. Martin	1.20	912.90	B130	
05/25/20	N. Koffroth	0.60	300.90	B130	
05/25/20	T. Moyron	0.60	359.55	B130	Conference call with R. Adcock, BRG, et al. re SGM litigation.
05/26/20	T. Moyron	1.10	659.18	B130	Analyze research and questions re SGM (.4); provide comments on same (.2); analyze Committee emails (.2); conference call with D. Eldan (.3).
05/27/20	T. Moyron	1.60	958.80	B130	Analyze updated response and prepare comments thereto (1.3); analyze Court's prior ruling (.2); exchange emails with Committee counsel (.1).
05/29/20	S. Martin	0.10	76.08	B130	Analysis regarding meet and confer strategy and confer with T. Moyron regarding same.
<b>Subtotal</b>		<b>6.00</b>	<b>3,655.87</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, MD, et al.  
Matter: 15800425-000020  
Invoice No.: 2293316

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	56,755.44
B130	Asset Disposition	3,655.87
	Total This Matter	\$60,411.31

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	1.50	\$1,200.00
S. Maizel	\$800.00	2.70	\$2,160.00
S. Martin	\$760.75	10.90	\$8,292.22
J.S. Zeman	\$548.25	41.20	\$22,587.94
T. Moyron	\$599.25	15.80	\$9,468.18
M. Zeefe	\$480.25	2.40	\$1,152.62
N. Koffroth	\$501.50	28.30	\$14,192.45
I. Hsu	\$446.25	1.60	\$714.01
G. Medina	\$293.25	0.40	\$117.30
K.M. Howard	\$250.75	<u>2.10</u>	<u>\$526.59</u>
Totals		106.90	\$60,411.31
Fee Total	\$	60,411.31	
Invoice Total	\$	<u>60,411.31</u>	

The logo for Dentons, featuring the word "DENTONS" in white capital letters on a purple arrow-shaped background pointing to the right.

Main Document

Page 449 of 1317

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293317**Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

Payment Due Upon Receipt

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Total This Invoice	\$ 119,839.70
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In the case of overnight deliveries to:

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Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
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Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300

Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

June 28, 2020

**Invoice No. 2293317**

For Professional Services Rendered through May 31, 2020:

Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	A. Shiran	1.00	514.50	B190	Telephone conference with S. McCandless to discuss evidentiary support for motion and T. Moyron revisions to opposition to motion to withdraw (.4); review client comments and proposed revision to motion (.2) review and evaluate opposition to motion to withdraw including evidentiary cites and support thereof (.3); review correspondence from BZMB firm regarding opposition to withdrawal motion (.1)
05/01/20	T. Moyron	1.10	659.18	B190	Analyze updated version of opposition to motion to withdraw (.3) and related emails (.2); prepare email to CNA re mediation (.1); prepare email to clients, et al. re same (.1); and analyze related emails (.1); analyze matters related to mediation and mediators (.3).
05/01/20	S. Martin	0.30	228.23	B190	Review communications with CNA counsel regarding mediation (.1); confer with T. Moyron regarding same (.2).
05/01/20	S. Alberts	0.20	160.00	B190	SVMC Litigation. Communicate about potential mediators for CNA litigation and related claims issues for CNA.
05/01/20	C. Yur	0.50	208.25	B190	Review and edit opposition brief to CNA's motion for withdrawal of reference.
05/01/20	D. Cook	6.80	3,207.97	B190	Draft motion to withdraw reference response (3.8); incorporate revisions from Dentons team regarding same (1.3); multiple communications with Dentons team regarding same (.6); analysis and revisions regarding request for judicial notice corresponding to same (1.1).

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/20	S. McCandless	0.70	559.30	B190	Review T. Moyron proposed revisions to Opposition to Motion to Withdraw Reference (.30); telephone call with A. Youssefi regarding evidentiary support for motion and analysis of T. Moyron's revisions to Opposition (.40).
05/02/20	S. McCandless	0.30	239.70	B190	Communicate with A. Youssefi and Dentons team regarding evidentiary record matters for Opposition to Motion to Withdraw.
05/02/20	S. Maizel	1.00	800.00	B190	Review and revise Opposition to motion to withdraw the reference (.8); review and respond to emails re same (.2).
05/02/20	C. Yur	0.30	124.95	B190	Work on opposition to CNA's motion for withdrawal of reference.
05/02/20	S. Martin	0.20	152.15	B190	Communicate with defense team regarding opposition to motion to withdraw reference and supporting request for judicial notice.
05/02/20	D. Cook	2.80	1,320.93	B190	Communications with Dentons team regarding opposition to motion to withdraw reference (.4); analysis and revision regarding corresponding Request Judicial Notice (2.4).
05/02/20	A. Shiran	1.20	617.40	B190	Numerous correspondence with internal team regarding evidentiary record (.3); assist with cite checking of opposition brief (.9).
05/03/20	A. Shiran	2.00	1,029.00	B190	
05/03/20	D. Cook	6.10	2,877.74	B190	Communications with Dentons team regarding opposition to motion to withdraw reference (.4); incorporate revisions regarding same (4.8); research regarding jury trial right waiver (.9).
05/03/20	C. Yur	1.50	624.75	B190	Review and cite check the opposition brief to CNA's withdrawal of reference motion.

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/03/20	S. Alberts	2.10	1,680.00	B190	SVMC Litigation. Review and provide comments to the Objection to the Motion to Dismiss (1.3) and send with comments to working group (.2), receive, review and comment on BZBM's objection to withdraw of reference for individual defendants (.4), follow up communications regarding with Opposition (.2).
05/03/20	S. Martin	0.20	152.15	B190	Review case law regarding jury trial issues.
05/03/20	S. McCandless	2.30	1,837.70	B190	
05/04/20	G. Medina	2.60	762.45	B190	File opposition and request for Judicial Notice in support of opposition with exhibits and further break up to comply with file size limit (1.4); download all pleadings filed and work on internal distribution of filed pleadings ( 1.2).
05/04/20	S. Martin	0.10	76.08	B190	Attention to request for judicial notice in support of opposition to motion to withdraw.
05/04/20	T. Moyron	3.70	2,217.23	B190	Analyze and prepare opposition to motion to withdraw the reference (2.6); conference call with D. Cook re waiver of jury trial right (.5); analyze case law re consent and waiver (.6).
05/04/20	T. Moyron	0.70	419.48	B190	Analyze and provide comments re individual defendants opposition and joinder (.5); exchange emails with L. Fernandez re same (.2).
05/04/20	C. Montgomery	7.30	5,840.00	B190	Communications with T Moyron and S Alberts regarding motion to withdraw reference and jury trial issues (.2); review draft response to Motion to withdraw reference, case review and draft substantial comments re same (4.7); phone call with T Moyron re same (.1); propose revisions to latest version (2.3).



Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	S. Alberts	2.00	1,600.00	B190	Review drafts including potential modified argument on jury trial issue in connection with objection to withdraw motion and communications related there to (1.7); review and provide comments to joinder by Institutional Defendants (.3).
05/04/20	A. Shiran	6.80	3,498.60	B190	Assist with finalizing evidentiary citations to opposition to motion to withdraw (1.9 ) finalize legal citations in support of opposition to motion to withdraw and perform case cite check (2.3 ); draft and revise request for judicial notice (1.8); review and assist with finalization of opposition to motion to withdraw (.8).
05/04/20	T. Moyron	0.50	299.63	B190	Analyze final version of opposition to motion to withdraw (.3); analyze related emails (.2).
05/04/20	S. Maizel	0.10	80.00	B190	Telephone conference with T. Moyron re CNA proceeding issues.
05/04/20	S. Maizel	0.50	400.00	B190	Review and respond to emails re Opposition to motion to withdraw the reference.
05/04/20	D. Cook	13.30	6,274.41	B190	Revise opposition to motion to withdraw reference (7.3); research regarding jury trial right waiver (3.1); communications with Dentons team regarding same (.7); draft portions of opposition regarding same (1.3); communications with Dentons team regarding overall opposition strategy (.5); analysis regarding Request for Judicial Notice (.4).
05/04/20	J.A. Moe, II	0.10	59.93	B190	Review exchange of E-Mails between Kevin Gunya and An Ruda on issues related to AIG decision on coverage, in regard to the CNA Litigation, and review of prior E-Mails to and from Ms. Ruda.

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/04/20	G. Medina	3.40	997.05	B190	Work on request to obtain exhibits from CNA adversary to include in opposition motion (0.1); pull and send exhibits to C. Yur (0.4); received, reviewed and work on preparation of exhibits (2.3); call wit T. Moyron re filing (0.1); review RJN revised and email to D. Cook (0.4); call with N. Koffroth re filings (0.1).
05/04/20	S. McCandless	1.50	1,198.50	B190	Communicate with A. Youssefi regarding approach to Request for Judicial Notice accompanying Opposition to Motion to Withdraw the Reference (.60); review final version of Opposition to Motion to Withdraw (.90).
05/04/20	N. Koffroth	8.80	4,413.20	B190	Draft opposition to motion to withdraw the reference re CNA adversary proceeding
05/04/20	C. Yur	0.60	249.90	B190	Gather exhibits for the request for judicial notice and work with paralegal on filing the exhibits.
05/05/20	J.A. Moe, II	0.10	59.93	B190	Telephone call from Karleen Murphy on response to the AIG reservation of rights letter.
05/05/20	K.M. Howard	0.60	150.45	B190	Reviewed and assembled documents filed by Debtors' in support of Opposition to Plaintiffs' Motion to Withdraw Reference (.4); reviewed docket to determine additional deadlines set by the court (.2).
05/06/20	S. Alberts	0.30	240.00	B190	Review hearing scheduling orders and provide comment to working group on relevant issue for hearing at District Court.
05/11/20	S. Martin	0.30	228.23	B190	Review plaintiff's reply in support of motion to withdraw reference.
05/11/20	T. Moyron	0.60	359.55	B190	Analyze CNA filed pleadings.
05/12/20	S. Martin	0.90	684.68	B190	Review and analyze request for judicial in support of CNA's reply re motion to withdraw reference, order regarding motion to dismiss hearing, and email relating to same (.4); review and analyze CNA's opposition to motion to dismiss (.5).


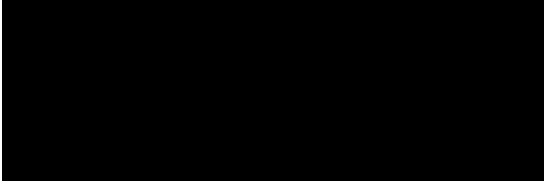
Adv. Proceeding - California Nurses Association (CAN) v.  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/20	A. Shiran	0.40	205.80	B190	Evaluate status of mediation and impact on motion to withdraw and motion to dismiss (.2) numerous internal correspondence regarding same (.2).
05/12/20	S. Alberts	1.00	800.00	B190	Review reply to objection to motion to withdraw the reference (.4) and follow up with co-counsel (.2); review objection to Motion to Dismiss (.4).
05/12/20	D. Cook	1.10	518.94	B190	Communications with S Martin regarding MTD reply (.2); review and analysis of CNA opposition to MTD (.4); communications with Dentons team regarding same (.2); communications with T Moyron regarding adversary scheduling order (.1); analysis regarding timelines pertaining to same (.2).
05/12/20	S. McCandless	1.20	958.80	B190	Initial review of Reply to Objection to Motion to Withdraw Reference (.70); communicate with S. Alberts regarding employment arguments contained therein (.20); communicate with Dentons team regarding analysis of Opposition to Motion to Dismiss for Reply and impact of mediation (.20); communicate with S. Martin regarding stipulation staying hearing on Motion to Dismiss (.10).
05/13/20	S. Maizel	0.50	400.00	B190	Telephone conference with S. Martin, etc. re pending pleadings.
05/13/20	S. McCandless	1.40	1,118.60	B190	Initial review of Opposition to Dismiss to plan allocation of work (.80); Dentons team call for preliminary analysis and to discuss same (.60).
05/13/20	D. Cook	1.10	518.94	B190	Telephone conference with Dentons team regarding response to CNA opposition to motion to dismiss (.6); review and analysis of same in preparation of call (.5).
05/13/20	C. Yur	1.00	416.50	B190	Review CNA's opposition to the motion to dismiss (0.4) and strategize with the team on the reply for the motion to dismiss (0.6).
05/13/20	S. Martin	1.00	760.75	B190	Attention to preparing reply in support of motion to dismiss and confer with defense team regarding same.

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
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June 28, 2020

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05/13/20	T. Moyron	0.50	299.63	B190	Exchange emails with counsel for CNA (.1); conference call with counsel for CNA and L. Fernandez (.4).
05/13/20	T. Moyron	0.60	359.55	B190	Conference call with S. Martin, et al. re reply to CNA opposition re motion to dismiss (.3); analyze matters related to opposition (.3).
05/13/20	A. Shiran	1.50	771.75	B190	Review opposition to motion to dismiss (.9); team call to discuss reply in support of motion to dismiss. (.6).
05/14/20	S. Martin	0.40	304.30	B190	Outline arguments for reply on fraud claims.
05/14/20	D. Cook	2.60	1,226.58	B190	Call with S Martin regarding state law fraud portion of reply re motion to dismiss (.4); analysis regarding same in preparation of call (.8); draft notice of intent to mediate and request for stay of hearing regarding motion to withdraw reference (1.4).
05/14/20	C. Yur	4.00	1,666.00	B190	Analyze legal authorities and arguments made by opposing counsel in their opposition to the motion to dismiss and consider defenses and counterarguments against their claims.
05/15/20	D. Cook	8.20	3,868.43	B190	Draft insert for reply regarding motion to dismiss pertaining to state law claims (6.8); revisions and analysis regarding notice of intent to mediate (1.4).
05/15/20	A. Shiran	4.40	2,263.80	B190	Analyze arguments in support of reply to opposition to motion to dismiss (.4) 
					
05/15/20	S. Martin	0.80	608.60	B190	Prepare notice to Judge Wilson regarding intent to mediate (.2); review research regarding plaintiff's case law on association standing and outline reply argument on same (.6).
05/16/20	D. Cook	0.40	188.70	B190	Draft insert for motion to dismiss reply regarding state law claims.

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/17/20	C. Yur	1.50	624.75	B190	Draft reply to opposition on how CNA fails to meet associational standing to assert state tort claims.
05/18/20	S. Martin	0.40	304.30	B190	Attention to notice of intent to mediate and request continuance (.1); review and edit response to CNA's argument regarding associational standing (.3).
05/18/20	K.M. Howard	0.40	100.30	B190	Analysis of Notice of Intent to Mediate and reviewed and revised Critical Dates Memorandum as to the pending reference motion.
05/18/20	T. Moyron	0.80	479.40	B190	Analyze and prepare Notice of Intent to Mediate (.4); correspond with D. Cook re same (.3); exchange emails with counsel for CNA re same (.1).
05/18/20	A. Shiran	7.10	3,652.95	B190	Draft reply in support of motion to dismiss [REDACTED] [REDACTED] assist with associational standing argument in support of reply to motion to dismiss (1.7).
05/18/20	D. Cook	1.10	518.94	B190	Revisions regarding notice of intent to mediate (.9); communications with Dentons team regarding same (.2).
05/18/20	D. Cook	0.40	188.70	B190	Communications with Dentons team regarding priority issue regarding CNA claims (.1); analysis regarding same (.3).
05/18/20	C. Yur	0.80	333.20	B190	Conduct legal research and analyze legal research for authorities supporting defense that CNA lacks associational standing.
05/19/20	A. Shiran	3.60	1,852.20	B190	Continue drafting reply in support of motion to dismiss.
05/19/20	D. Cook	6.80	3,207.97	B190	[REDACTED]

Adv. Proceeding - California Nurses Association (CAN) v.  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/19/20	C. Yur	0.80	333.20	B190	Analyze legal research and locate legal authorities supporting our position that CNA lacks associational standing to bring the tort claims.
05/19/20	S. Martin	2.30	1,749.73	B190	Draft reply in support of motion to dismiss on fraud claims.
05/19/20	S. McCandless	0.70	559.30	B190	Discuss drafting of reply brief on Motion to Dismiss with A. Youssefi.
05/20/20	S. McCandless	2.80	2,237.20	B190	Review first draft of Reply in support of Motion to Dismiss for additions and revisions to same (.90); review portions of CNA Complaint and Opposition to Motion to Dismiss to provide comments on same (.80); provide detailed comments to A. Youssefi for additions and revisions for first draft of Reply, particularly to introduction, background facts, and judicial notice discussion (1.10).
05/20/20	A. Shiran	7.90	4,064.55	B190	Conduct further research in support of reply in support of motion to dismiss including case law cited by CNA (2.6); [REDACTED] draft argument in response to objection to judicial notice requests in support of reply to motion to dismiss (1.2).
05/20/20	S. Martin	1.40	1,065.05	B190	Draft reply in support of motion to dismiss.
05/20/20	D. Cook	1.60	754.82	B190	Revisions regarding state law section of reply to motion to dismiss (1.1); analysis regarding SVMC closure pursuant to section 1108 (.2); communications with Dentons team regarding reply to motion to dismiss (.3).
05/20/20	C. Yur	0.50	208.25	B190	Work on reply brief opposing CNA's claim that it has associational standing to assert tort claims.

Adv. Proceeding - California Nurses Association (CAN) v.  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/20	S. Alberts	3.10	2,480.00	B190	CNA Litigation. Review and provide extensive comments to Institutional Defendants' Reply to Objection to Rule 12(b) Motion (2.3); follow up (.2); review and provide comments to Individual Defendant's Reply (.3); communicate with T. Moyron about mediator names and next steps (.3).
05/21/20	S. McCandless	4.50	3,595.50	B190	Revise Reply Brief on Motion to Dismiss (1.90); t [REDACTED] [REDACTED] review [REDACTED] S. Alberts' proposed changes to draft of Reply Brief (.40); discuss further revisions to Reply Brief in light of same with A. Youssefi (.20); review A. Youssefi's further revised draft (.50); further discuss and decide said revisions with A. Youssefi (.30); various communications with bankruptcy team regarding selection of Mediator (.20); related review of same (.10); review Bartko Reply on Motion to Dismiss (.40).
05/21/20	D. Cook	1.40	660.46	B190	Revise reply to motion to dismiss (.8); analysis regarding citations to opposing papers (.4); communications with Dentons team regarding same (.2).
05/21/20	A. Shiran	4.90	2,521.05	B190	Draft reply in support of motion to dismiss (2.3) ; discuss associational standing arguments with Carol Yur (.7); review and incorporate bankruptcy team revisions to reply (1.9);
05/21/20	S. Martin	1.30	988.98	B190	Drafting reply in support of motion to dismiss and confer with defense team regarding same (.9); review draft reply of individual defendants (.2); review and comment on stipulation continuing hearing (.2).
05/21/20	T. Moyron	1.10	659.18	B190	Review backgrounds of possible mediators (.4); exchange emails with CNA re same (.2); analyze and prepare comments to stipulation re CNA (.3); exchange emails re same (.2).

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
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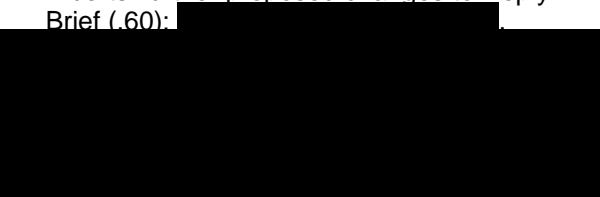
June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/20	C. Yur	3.80	1,582.70	B190	Work on reply brief in support of motion to dismiss (1.2); work on cite-checking authorities and edit reply brief (2.6).
05/21/20	I. Hsu	2.70	1,204.88	B190	Draft stipulation re continuation of hearing.
05/22/20	D. Cook	9.30	4,387.37	B190	Draft fraud section of reply to motion to dismiss (1.1); global revisions to reply to motion to dismiss (7.6); communications with Dentons team regarding same (.4); communications with A Youssefi, C Yur and G Medina regarding filing of same (.2).
05/22/20	C. Yur	0.20	83.30	B190	Review and edit reply brief in support of motion to dismiss.
05/22/20	S. Alberts	1.60	1,280.00	B190	CNA Litigation. Communicate with co-counsel about changes to reply to opposition to motion to dismiss (.1); follow up review and comments on reply brief (1.3) and circulate to co-counsel for review (.1); communicate about mediation (.1).
05/22/20	S. Maizel	0.60	480.00	B190	Review and revise reply in support of 12(b)(6) motion.
05/22/20	A. Shiran	6.70	3,447.15	B190	Continue drafting and finalizing reply in support of motion to dismiss (3.5 ); telephone conferences with S. McCandless regarding reply and request for judicial notice (1.6); telephone conference with Sonia Martin regarding judicial notice request (.2) telephone conference with S. McCandless and S. Martin regarding reply (.2); call with S. McCandless and T. Moyron regarding reply filing (.1); review citations to record and cases in reply brief (.8); numerous correspondence with David Cook regarding finalization of reply (.3)
05/22/20	G. Medina	0.50	146.63	B190	File Reply in Support of Motion To Dismiss Complaint Under Rule 12(B), With Prejudice with Request for Judicial Notice in Support (0.4); download and send e file copy to team (0.1).



Adv. Proceeding - California Nurses Association (CAN) v.  
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June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/20	S. McCandless	3.90	3,116.10	B190	Review latest version of Reply Brief on Motion to Dismiss and revise same (1.00); communicate with S. Alberts regarding revisions to Reply Brief (.20); review S. Alberts' further proposed changes to Reply Brief (.60); 
05/22/20	T. Moyron	2.60	1,558.05	B190	communicate with S. Martin, A. Youssefi, and D. Cook regarding questions as related to proposed Request for Judicial Notice (.20); telephone call with T. Moyron regarding filing (.10).
05/22/20	T. Moyron	2.60	1,558.05	B190	Analyze and prepare reply to CNA's opposition (2.2); prepare email to R. Adcock, et al. (.1); analyze related emails (.3).
05/22/20	S. Martin	1.50	1,141.13	B190	Continue drafting reply in support of motion to dismiss and communicate with defense team regarding same.
05/23/20	G. Medina	0.50	146.63	B190	Communication with D. Cook regarding service to CNA (0.1); review docket and serve CNA Counsel with pleadings filed (0.4).
05/26/20	T. Moyron	0.50	299.63	B190	Exchange emails with counsel for CNA re mediation (.1); exchange emails with R. Adcock re same (.1); analyze final version of DC stipulation and order (.1); prepare emails regarding stipulation in Bankruptcy Court (.1); analyze email re same (.1).
05/26/20	S. Alberts	0.10	80.00	B190	Review communications regarding mediation and stay of litigation.
05/26/20	K.M. Howard	0.40	100.30	B190	Analysis of Joint Stipulation to continue Motion to Withdraw Reference pending Mediation and reviewed and revised Critical Dates Memorandum accordingly.
05/26/20	I. Hsu	0.60	267.75	B190	Correspondence and oversee filing of stipulation.

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/26/20	J.A. Moe, II	0.20	119.85	B190	Review multiple E-Mails on insurance coverage issues and exchange E-Mails with An Ruda on coverage for EPL Claims, including latest response from Kimberly Huebner and earlier E-Mail from Kevin Gunya.
05/26/20	J.A. Moe, II	0.10	59.93	B190	Review Stipulation On Continuance Of Hearing On Motion To Withdraw The Reference Pending Mediation.
05/27/20	D. Cook	0.40	188.70	B190	Email communications with T Moyron and S Martin regarding joint status report (.1); analysis regarding impact of stipulation with CNA on same (.1); telephone conference with I Hsu regarding CNA stipulation (.1); analysis pertaining to voice message regarding same (.1).
05/27/20	S. Martin	0.30	228.23	B190	Email with counsel regarding stipulation continuing hearing on motion to withdraw (.2); review and calendar order regarding same (.1).
05/27/20	I. Hsu	2.60	1,160.25	B190	Draft and edit stipulation for adversary proceeding.
05/27/20	K.M. Howard	0.40	100.30	B190	Analysis of the Court's Order changing the jointly stipulated hearing date regarding the motion to withdraw reference and reviewed and revised Critical Dates Memorandum accordingly.
05/28/20	J.A. Moe, II	0.10	59.93	B190	Review communications from Karen Chapman on continuing contact with Insurer, on insurance for litigation; review exchange of multiple E-Mails originating from An Ruda on interfacing with the Carrier's representative Talis Knets.
05/28/20	I. Hsu	0.70	312.38	B190	Correspondence and edits to stipulation to stay adversary proceeding pending mediation.
05/29/20	S. Martin	0.10	76.08	B190	Review and respond to email regarding continuance of status conferenece.
05/29/20	K.M. Howard	0.20	50.15	B190	Analysis of Stipulation regarding CNA's late response and reconciled same to Critical Dates Memorandum

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/20	K.M. Howard	0.40	100.30	B190	Analysis of Joint Stipulation to Stay Adversary Proceeding pending Mediation and reviewed and revised Critical Dates Memorandum accordingly.
05/29/20	I. Hsu	0.70	312.38	B190	Correspondence and revision of stipulation.
	<b>Subtotal</b>	<b>216.40</b>	<b>119,588.95</b>		

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
05/13/20	N. Koffroth	0.50	250.75	EMP	Participate in internal call re drafting reply in support of motion to dismiss re CNA litigation
	<b>Subtotal</b>	<b>0.50</b>	<b>250.75</b>		

Adv. Proceeding - California Nurses Association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2293317

June 28, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B190	Other Contested Matters (excl. assumption/rejection motions)	119,588.95
EMP	Employee matters	250.75
	Total This Matter	\$119,839.70

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	7.30	\$5,840.00
S. Alberts	\$800.00	10.40	\$8,320.00
S. Maizel	\$800.00	2.70	\$2,160.00
S. Martin	\$760.75	11.50	\$8,748.67
S. McCandless	\$799.00	19.30	\$15,420.70
T. Moyron	\$599.25	12.70	\$7,610.51
J.A. Moe, II	\$599.25	0.60	\$359.57
A. Shiran	\$514.50	47.50	\$24,438.75
N. Koffroth	\$501.50	9.30	\$4,663.95
I. Hsu	\$446.25	7.30	\$3,257.64
C. Yur	\$416.50	15.50	\$6,455.75
D. Cook	\$471.76	63.40	\$29,909.60
G. Medina	\$293.25	7.00	\$2,052.76
K.M. Howard	\$250.75	<u>2.40</u>	<u>\$601.80</u>
Totals		216.90	\$119,839.70

Fee Total \$ 119,839.70

Invoice Total \$ 119,839.70

# Exhibit E

DENTONS

Main Document

Page 467 of 2278

SNR Denton US LLP  
8000 Sears Tower  
Suite 2500  
Chicago, IL 60606Alston Hunt Floyd & Ing is now  
Dentons -- continuing services  
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Los Angeles, California 90017-5704

dentons.com

Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303156**

Matter: 15800425-000003  
Verity Health System of California

Payment Due Upon Receipt

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Total This Invoice	\$ 342,482.38
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

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Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303156**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000003  
Verity Health System of California

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	L. Macksoud	0.90	393.98	APP	Confer with C. Montgomery and research case law in preparation for 9th circuit oral argument.
06/01/20	C. Montgomery	7.80	6,240.00	APP	Continued preparations for Ninth circuit oral argument (6.8); Rehearse presentation for oral argument (1.0 )
06/02/20	C. Montgomery	5.40	4,320.00	APP	Continued preparation for oral argument for Ninth Circuit (3.6) ; participate in Oral Argument (1.5) ; follow up call with T Moyron and S Maizel (.3)
06/02/20	L. Macksoud	2.30	1,006.83	APP	Review case law and discuss holdings with C. Montgomery in preparation for 9th circuit oral argument, observe argument on DIP appeal.
06/02/20	S. Maizel	1.00	800.00	APP	Attend 9th circuit hearing on committee appeal of dismissal of appeal of DIP Financing order (.8); telephone conference with C. Montgomery re same (.1); telephone conference with P. Ricotta re same (.1).
06/02/20	T. Moyron	0.60	359.55	APP	Analyze Ninth Circuit oral argument re DIP Order (.5); conference call with C. Montgomery thereafter (.1).
06/02/20	N. Koffroth	1.00	501.50	APP	Attend Ninth Circuit argument re Committee appeal
06/03/20	C. Montgomery	0.20	160.00	APP	Debrief call with Paul Ricotta regarding yesterday's argument.
06/05/20	K.M. Howard	0.50	125.38	APP	Received video of oral argument in UCC v. Verity from the Ninth Circuit Court of Appeals and reviewed same.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	K.M. Howard	0.30	75.23	APP	Analysis of Ninth Circuit Court of Appeal's Memorandum and attachments (.2); prepared email to Verity Team (.1).
06/09/20	S. Maizel	0.40	320.00	APP	Review 9th circuit decision re UCC appeal (.1); telephone conference with C. Montgomery, etc. re same (.3).
06/09/20	C. Montgomery	0.90	720.00	APP	Review Ninth Circuit affirming of order dismissing appeal from Committee challenge to Final DIP Order (.2); phone conference with S Maizel and T Moyron re same (.2); phone call with LMacksoud re same (.1); communications with RAdcock and P Chadwick re same (.2); communications with R Richards and S Martin re same (.2)
06/09/20	L. Macksoud	0.50	218.88	APP	Review 9th circuit memo decision on UCC Dip appeal.
06/10/20	K.M. Howard	0.30	75.23	APP	Reviewed the Memorandum received from the Ninth Circuit Court of Appeal (.2); prepared email to Verity Team regarding same including followup emails with C. Montgomery (.1).
<b>Subtotal</b>		<b>22.10</b>	<b>15,316.58</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	K.M. Howard	0.50	125.38	B110	Analysis of tentative rulings for June 3rd and reviewed Critical Dates Memorandum to determine matters before the court (.3); reconciled tentative rulings with Critical Dates Memorandum and revised accordingly (.2).
06/02/20	M. Zeefe	0.80	384.20	B110	Review and circulate upcoming week's key dates to core team.
06/03/20	K.M. Howard	0.10	25.08	B110	Email exchange with L. Odum regarding Courtcall.
06/04/20	T. Moyron	0.40	239.70	B110	Conference call with N. Koffroth re coordinate work streams and project memorandum.
06/05/20	N. Koffroth	2.00	1,003.00	B110	Participate in internal call with R. Adcock, P. Chadwick, et al. re case status [REDACTED] participate in internal call re workstreams memo (0.7)
06/05/20	N. Koffroth	1.80	902.70	B110	Draft workstreams memorandum
06/05/20	K.M. Howard	0.20	50.15	B110	Reviewed Critical Dates Memorandum to determine upcoming hearings.
06/05/20	T. Moyron	0.20	119.85	B110	Conference call with N. Koffroth regarding workstream memo.
06/08/20	M. Sanchez	3.00	765.00	B110	Review and organize exhibits and declaration, prepare for filing with the Court, and file with the Court
06/08/20	M. Zeefe	1.00	480.25	B110	Review and circulate upcoming week's key dates to core team.
06/09/20	K.M. Howard	0.40	100.30	B110	Email exchanges regarding the hearings set for June 10th (.1); reviewed and revised Critical Dates Memorandum (.2); prepared email to Verity Team regarding same (.1).
06/10/20	T. Moyron	0.60	359.55	B110	Conference call with S. Maizel and R. Adcock re 1113 motions and related matters and plan.
06/10/20	T. Moyron	0.50	299.63	B110	Conference call with R. Adcock, BRG, et al. re case status and matters, including plan and medicare and medi-cal agreements.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	K.M. Howard	0.30	75.23	B110	Reviewed and revised Critical Dates Memorandum.
06/10/20	S. Maizel	0.40	320.00	B110	Telephone conference with T. Moyron, etc. re pending issues.
06/15/20	T. Moyron	0.50	299.63	B110	Conference call with H. Levy-Biehl regarding case matters, including POL discussions.
06/15/20	M. Zeefe	0.80	384.20	B110	Review and circulate upcoming week's key dates to core team.
06/16/20	K.M. Howard	0.20	50.15	B110	Reviewed transcript request form for the June 10th hearing transcript (.1); prepared email to K. Persaud of Hyatt Court Reporters regarding same (.1).
06/16/20	K.M. Howard	0.30	75.23	B110	Telephone conference with John Moe regarding members of Verity's accounting department (.1); reviewed Master Contact List and culled requested information (.1); prepared email to J. Moe regarding same (.1).
06/17/20	T. Moyron	0.20	119.85	B110	Analyze P. Chadwick agenda (.1); conference call with P. Chadwick, et al. re agenda (.1).
06/17/20	T. Moyron	1.00	599.25	B110	Conference call with R. Adcock, BRG, et al. re Plan, sale status, other pending matters.
06/17/20	S. Maizel	1.00	800.00	B110	Telephone conference with R. Adcock, BRG, etc. re pending issues.
06/17/20	C. Montgomery	0.70	560.00	B110	Participate in Verity Dentons team call with R. Adcock, P. Chadwick, T. Moyron and S. Maizel.
06/17/20	N. Koffroth	1.00	501.50	B110	Participate in weekly internal team meeting with R. Adcock, P. Chadwick, et al.
06/18/20	K.M. Howard	0.20	50.15	B110	Emails and telephone conference regarding upcoming hearings in Verity.
06/22/20	S. Maizel	0.10	80.00	B110	Review and respond to emails re LA Times ad.
06/22/20	M. Zeefe	0.60	288.15	B110	Review and circulate key dates for upcoming week to core team.
06/22/20	K.M. Howard	0.30	75.23	B110	Analysis of critical dates memorandum to determine upcoming and continued hearings.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	K.M. Howard	0.10	25.08	B110	Prepared email to E. Estrada requesting removal of certain parties from the service lists.
06/23/20	K.M. Howard	0.20	50.15	B110	Reviewed Critical Dates Memorandum to determine upcoming hearings.
06/23/20	K.M. Howard	0.60	150.45	B110	Reviewed and revised Critical Dates Memorandum (.4); telephone conference with S. Maizel (.1); prepared email to Astria Team (.1).
06/24/20	S. Maizel	0.80	640.00	B110	Telephone conference with R. Adcock, BRG, etc. re pending issues.
06/24/20	N. Koffroth	0.80	401.20	B110	Participate in weekly internal case meeting with R. Adcock, P. Chadwick, et al.
06/29/20	M. Zeefe	0.90	432.23	B110	Review and circulate week's key dates to core team.
06/29/20	K.M. Howard	0.30	75.23	B110	Reviewed Critical Dates Memorandum regarding hearing on July 1st and July 2nd and reconciled with Judge Robles tentative rulings to determine remaining matters before the court.
06/30/20	S. Maizel	0.20	160.00	B110	Telephone conference with R. Adcock, etc. regarding pending issues.
<b>Subtotal</b>		<b>23.00</b>	<b>11,067.70</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	S. Maizel	0.60	480.00	B130	Telephone conference with Paul Osborne, BRG, re CARES Act payments.
06/04/20	T. Moyron	0.70	419.48	B130	Conference call with advisors for 2005s re sale update and related matters.
06/05/20	S. Maizel	0.50	400.00	B130	Telephone conference with Secured creditors re sales process.
06/05/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, etc re sales process.
06/16/20	N. Koffroth	0.40	200.60	B130	Participate in weekly call with R. Adcock, J. Moloney, et al. re sale processes
06/18/20	S. Maizel	0.60	480.00	B130	Telephone conference with Mintz Levin, Houlihan, etc. re sales issues .
06/22/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re sale issues.
06/23/20	N. Koffroth	0.30	150.45	B130	Participate in weekly call re sale status with R. Adcock, J. Moloney, et al.
06/25/20	T. Moyron	0.80	479.40	B130	Conference call with 2005 advisors re sale updates, etc.
06/25/20	S. Maizel	0.80	640.00	B130	Telephone conference with Mintz Levin, Houlihan, etc. re pending sale issues.
<b>Subtotal</b>		<b>5.20</b>	<b>3,649.93</b>		

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Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	K.M. Howard	0.30	75.23	B140	Reviewed docket to determine if any stay orders were entered in May 2020 (.2); prepared email to N. Haslun regarding same (.1).
	<b>Subtotal</b>	<b>0.30</b>	<b>75.23</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B150 - Meetings of and Communications with Creditors**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	G. Medina	2.70	791.78	B150	Received email from T. Moyron regarding integrity/Blue Mountain documents we produced to the Committee (0.1); review all productions and email correspondence between A. Ruegger and the committee (2.0); communication and call with T. Moyron regarding production (0.2); communication and call with A. Ruegger regarding production (0.4).
06/25/20	A. Ruegger	2.10	1,680.00	B150	Communications with T. Moyron, N. Koffroth and G. Medina re document production to UCC (0.3); review files produced to UCC (1.4); communications with G. Medina re same (0.4).
06/29/20	A. Ruegger	0.50	400.00	B150	Communications with T. Moyron, S. Maizel, N. Koffroth and G. Medina re document production to UCC.
06/29/20	G. Medina	2.50	733.13	B150	Review, retrieve and send document productions at the request of T. Moyron to P. Chadwick (2.2); call with A. Ruegger regarding new productions and redactions of confidential information (0.3).
06/30/20	A. Ruegger	0.30	240.00	B150	Review records for Blue Mountain and Integrity files for production to UCC.
<b>Subtotal</b>		<b>8.10</b>	<b>3,844.91</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B160 - Fee/Employment Applications**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	K.M. Howard	3.20	802.40	B160	Reviewed and finalized Dentons' April Fee Application and exhibits thereto (.4); reviewed and redacted billings statements (2.7); prepared email to S. Maizel and T. Moyron regarding same (.1).
06/01/20	K.M. Howard	0.30	75.23	B160	Email exchange with Davis Wright Tremaine regarding their interim fee application (.1); conference with J. Moe regarding revisions to their fee application (.1); followup email exchange with Nara Neves regarding same (.1).
06/01/20	J.A. Moe, II	0.60	359.55	B160	/Dentons Monthly Fee Application/ Review and assemble sets of Fee Applications' drafts and filed Statements for February and March, and April Statements pending the filing of the April Fee Application.
06/01/20	J.A. Moe, II	0.70	419.48	B160	/Davis Wright Tremaine/ Exchange E-Mails with Nara Neves, and two telephone calls with Ms. Neves on filing Fee Application (.20); E-Mail to and telephone call with Andres Estrada on service of the Application (.10); telephone call with Kathryn Howard on contents of paragraph 9 of the DWT Fee Application (.10); two additional telephone calls with Nara Neves on service and revision of the Application (.10); review the revised Application, exchange E-Mails with Kathryn Howard on review and telephone call to Ms. Neves on proceeding to file the Application (.20).
06/01/20	K.M. Howard	0.40	100.30	B160	Analysis of Notice and BRG's Third Interim Fee Application and reviewed and revised Critical Dates Memorandum accordingly.
06/02/20	K.M. Howard	0.40	100.30	B160	Email exchange with J. Behrens regarding Milbank's and FTI's April fee application (.1); reviewed Milbank's April fee application (.1); reviewed FTI Consulting April fee application (.1); discussed same with J. Moe (.1).



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Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	J.A. Moe, II	0.20	119.85	B160	/Davis Wright Tremaine/ Review Nara Neves' E-Mail and revised Application For Fees, and E-Mail to Ms. Neves on approval of the Application's changes to paragraph 9.
06/03/20	J.A. Moe, II	1.00	599.25	B160	/Dentons Fifth Interim Fee Application/ Exchange E-Mails with, and revise with Tania Moyron the descriptions of services to be included in the Fee Application (20); E-Mail to Attorneys transmitting Memorandum on preparing sections of the Fee Application (.20); revise the Fee Application to reflect revised List of major tasks performed between January and April , 2020 (.60).
06/03/20	J.A. Moe, II	0.10	59.93	B160	/Davis Wright Tremaine/ Review Fee Application filed for Davis Wright Tremaine.
06/03/20	J.A. Moe, II	0.20	119.85	B160	/Professionals Fifth Interim Fee Applications/ Exchange E-Mails with Tania Moyron, then complete the Notice with one revision; additional internal review of the Notice.
06/03/20	T. Moyron	0.40	239.70	B160	Analyze Cain engagement agreement and prior emails re attorneys' fees (.2); exchange emails with R. Adcock re same (.2).
06/04/20	J.A. Moe, II	0.20	119.85	B160	/Dentons Fifth Interim Fee Application/ Review and revise the newly prepared opening section of the Fee Application.
06/04/20	A. Shiran	1.20	617.40	B160	Assist with preparation of 5th interim fee application.
06/05/20	K.M. Howard	0.20	50.15	B160	Received and briefly reviewed Dentons' billing statements for May 2020.
06/05/20	K.M. Howard	0.60	150.45	B160	Reviewed and finalized BRG's April Fee Application (.2); filed BRG's April Fee Application (.3); email exchange with T. Moyron regarding same (.1).
06/05/20	J.A. Moe, II	0.80	479.40	B160	/Dentons May Monthly Fee Application/ Commence review in earnest, and revise in compliance with U.S. Trustee Guidelines the Statements on Submatters 4, 5, 12, 14, 15, 16 and 19, and the Expense Statement.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
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July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	J.A. Moe, II	0.30	179.78	B160	/Dentons May Monthly Fee Application/ Preliminarily review the May Statements and directions on preparing Statements in compliance with U.S. Trustee Guidelines.
06/08/20	S. Maizel	0.50	400.00	B160	Review and respond to emails re billing issues.
06/09/20	J.A. Moe, II	0.60	359.55	B160	/Dentons May Monthly Fee Application/ Telephone call with Karleen Murphy on necessity to review Verity Medical Foundation Statement, and E-Mail Statement to Ms. Murphy, and review of corrections (.30); E-Mail to Tania Moyron the Statement on St. Francis Medical Foundation and confirm transfer to St. Francis Hospital (.20); additional review and response to Karleen Murphy on Subpoenas for Medical Records reflected in Dentons' Statements (.10).
06/10/20	J.A. Moe, II	3.60	2,157.30	B160	/Dentons May Monthly Fee Application/ Telephone call with Karleen Murphy, in accordance with exchange of E-Mails with Tania Moyron and telephone call with and E-Mail to (and return E-Mail on June 11th from ) Chris Doherty, review and make further revisions to Statements on Submatters 10, 6 and 16, and 5 and 6 (.80); continue first review of additional Statements, and revise Statements on Submatter No 6 (1.40), Submatter No. 8 (.50), Submatter No. 20 (.40) and Submatter No 21 (.50), all in compliance with U. S. Trustee Guidelines.
06/11/20	J.A. Moe, II	1.50	898.88	B160	/Dentons May Monthly Fee Application/ Review and make first set of revisions to the Statements on Submatter No. 3, in compliance with U.S., Trustee Guidelines, including telephone calls with L. Libowsky and B. Greer on revisions to placement of their descriptions of services (1.30); review and assemble for transmittal for revisions the completed set of the descriptions of services for al Submatters (.20).

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July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	K.M. Howard	0.20	50.15	B160	Email exchange with A. Bruscella regarding wire received from the client and reviewed Debtors' Monthly Fee Application for March 2020 and reconciled same.
06/12/20	K.M. Howard	0.40	100.30	B160	Analysis of Notice of Hearing on Interim Fee Applications and reviewed and revised Critical Dates Memorandum.
06/12/20	J.A. Moe, II	0.20	119.85	B160	/Fifth Interim Fee Applications/ Review revised Notice, approve, direction on one change and authority to file and set date of August 5th; confirm availability of dare on Judge Robles' Calendar.
06/12/20	J.A. Moe, II	0.10	59.93	B160	/BZBM/ Review An Ruda's comments on and further research on representation.
06/15/20	K.M. Howard	4.50	1,128.38	B160	Conference with T. Moyron and reviewed redacted billing statement for April (.6); reviewed and redacted Dentons' April Billing Statements to attach as exhibits to Monthly Fee Application (.7); reviewed and revised Dentons' Monthly Fee Application for April 2020 (.3); finalized and prepared Dentons' Monthly Fee Application for filing (.4) and filed same (.3); analysis of monthly fee applications (x11) filed by all professionals for March and April and culled information for inclusion into Notice of Professionals' Monthly Fee Applications (1.1); prepared Notice of Professionals' Monthly Fee Applications (.7); finalized and prepared Notice of Professionals' Monthly Fee Applications for filing (.2) and filed same (.2).
06/15/20	J.A. Moe, II	1.60	958.80	B160	/Ordinary Course Professionals/ In regard to review of Administrative Fees, review previous report on fees incurred by Ordinary Course Professionals (.20); conference telephone call with David Galfus, Sam Maizel, Tania Moyron and Nick Koffroth, on Administrative Fees payable on the Effective Date of the Plan (.20); preliminarily review previously assembled Administrative Claims filed prior to the Bar Date (.20); prepare template on OCP obligations (.20); confer with Karleen Murphy on creating new template on SIR

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					and uninsured Claims (.50); exchange E-Mails and telephone call with Dave Hartie on Ballots (.10); telephone calls to David Hartie, then Andres Estrada, discussing with both the existence, then creation of a List of Administrative Claims (.20).
06/15/20	J.A. Moe, II	0.10	59.93	B160	/Dentons April Monthly Fee Application/ Review completion of the April Statements, and review Notice filed on all April Fee Applications.
06/15/20	K.M. Howard	0.40	100.30	B160	Analysis of Notice of Professionals' Monthly Fee Applications for April 2020 and reviewed and revised Critical Dates Memorandum.
06/15/20	K.M. Howard	0.20	50.15	B160	Analysis of the court's notice setting professionals' interim fee applications for hearing and reconciled same with Critical Dates Memorandum.
06/16/20	J.A. Moe, II	0.10	59.93	B160	E-Mail to Katherine Smith on April Statement in LEDES, and E-Mail to Hatty Yip (on June 17th) transmitting Statement in LEDES.
06/18/20	J.A. Moe, II	0.20	119.85	B160	/Dentons May Monthly Fee Application/ Preliminarily review the revised Statements, with first set of revisions, prepare Statements for second review, and necessity to proceed with review of calculations of separate descriptions.
06/19/20	J.A. Moe, II	2.90	1,737.83	B160	/Dentons May Monthly Fee Application/ Review first set of revisions, and make second set of revisions to Statements on Submatters Nos. 4, 6, 8, 10, 19, 20, 21 and the Expense Statements (1.10); review first set of revisions, and make second set of revisions to Statement on Submatter No. 6 (.90) and Submatter No. 3 (.90), in compliance with U.S. Trustee Guidelines.
06/22/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' May Monthly Fee Application/ Review with Kathryn Howard on the status of the review of the internal calculations on the separate descriptions of services.
06/22/20	J.A. Moe, II	0.10	59.93	B160	/BZBM/ Telephone call with Kerry Duffy on process and procedures to file Bartko's First Interim Fee Application.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/22/20	J.A. Moe, II	0.10	59.93	B160	/Davis Wright Tremaine/ Review Nara Neves E-Mail on Notice of Fee Application, and telephone call with Kathryn Howard on creating new Notice.
06/22/20	J.A. Moe, II	0.60	359.55	B160	/Dentons May Monthly Fee Application/ Review eleven sets of Statements, with corrections completed June 19th.
06/22/20	K.M. Howard	0.10	25.08	B160	Email exchanges with N. Neves regarding Davis Wright's monthly fee application and preparing a supplement to the notice.
06/23/20	J.A. Moe, II	0.20	119.85	B160	/Davis Wright Tremaine/ In regard to E-Mail from Nara Neves, review draft of the Supplemental Notice on fees and costs sought by DWT for April (.10); telephone call with Kathryn Howard on Supplemental Notice, and internal E-Mail on authority to file the Notice (.10).
06/23/20	K.M. Howard	1.00	250.75	B160	Analysis of Davis Wright Tremaine's Monthly Fee Application for February - April 2020 and prepared Supplement to Notice of Monthly Fee Applications (.7); prepared email to Verity Team regarding same (.1); telephone conference with J. Moe (.1); prepared followup emails to T. Moyron (.1).
06/23/20	K.M. Howard	0.10	25.08	B160	Email exchange with Davis Wright regarding the status of the supplement to the notice of monthly fee applications.
06/24/20	K.M. Howard	0.30	75.23	B160	Analysis of Supplement of Notice of Professional Monthly Fee Application, determined objection deadline and reviewed and revised Critical Dates Memorandum.
06/24/20	K.M. Howard	3.20	802.40	B160	Analysis of Dentons' Billing Statements for May 2020 and revised same to bring into compliance with US Trustee Guidelines (3.1); prepared email to J. Moe (.1).
06/24/20	K.M. Howard	0.40	100.30	B160	Revised and finalized Supplement to Notice of Monthly Fee Applications of Professionals and filed same.
06/24/20	K. Murphy	0.50	208.25	B160	Analyze email from John Moe requesting preparation of insert for 5th Fee Application and confer with John Moe re the same (.1); and prepare draft for insert (.4).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	J.A. Moe, II	0.30	179.78	B160	/Dentons May Monthly Fee Application/ Review the revisions to the calculation of time and descriptions of services, and forward for revision in accordance with U.S. Trustee Guidelines (.20); telephone call from Kathryn Howard on Ms. Howard's outstanding work on review (.10).
06/25/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' May Monthly Fee Application/ Multiple telephone calls and E-Mails to, and confer with internal personnel on process of transmitting and completing Statements.
06/26/20	J.A. Moe, II	0.20	119.85	B160	/Davis Wright Tremaine/ Review second Monthly Application filed in behalf of DWT, then telephone call to Nara Neves on review and confirming the filing of the Fee Application.
06/26/20	J.A. Moe, II	0.40	239.70	B160	/Dentons Fifth Interim Fee Application/ Retrieve and send June 3rd Memorandum to Dentons Attorneys on preparing sections of the Fee Application (.30); exchange E-Mails with Claude Montgomery (on June 26th) and exchange E-Mails and telephone call with Kathryn Howard (on June 27th) on responding to Claude Montgomery's request for Statements (.10).
06/26/20	J.A. Moe, II	0.60	359.55	B160	/Dentons' May Monthly Fee Application/ Review and calculate the fees to be reduced in regard to insuring Statements are in compliance with U.S. Trustee Guidelines (.30); E-Mail to Katherine Smith on fee reduction (.10); review, identify and reassemble Statements reflecting Kathryn Howard's corrections to the Statements (.20).
06/26/20	J.A. Moe, II	0.10	59.93	B160	/Milbank and FTI/ Review James Behrens' E-Mail and preliminarily review the Fee Applications prepared and filed in behalf of Milbank and FTI.
06/26/20	C. Montgomery	0.10	80.00	B160	Communications with J Moe regarding Fifth Interim Fee application.
06/28/20	K.M. Howard	0.20	50.15	B160	Reviewed and organized finalize billing statements for May 2020.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	J.A. Moe, II	0.20	119.85	B160	/Dentons' May Monthly Fee Application/ Review completing of the May Statements for review, and instructions on copies to Katherine Smith (.10); telephone call to Katherine Smith on revision to one description (.10).
06/29/20	K.M. Howard	0.40	100.30	B160	Reviewed and assembled Dentons' monthly fee applications and billing statements for the first quarter of 2020.
06/29/20	J.A. Moe, II	0.30	179.78	B160	/Dentons Fifth Interim Fee Application/ Revise the largest draft of the formatted Fee Application, making revisions on five pages, then transmit for inclusion into the Fee Application.
06/30/20	S. McCandless	0.40	319.60	B160	Communicate with A. Youssefi and J. Moe regarding preparation of fee application.
06/30/20	J.A. Moe, II	0.10	59.93	B160	/Dentons May Monthly Fee Application/ Review revised page for the Fee Application and transmit to Kathryn Howard and insert into the Application.
06/30/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' April Monthly Fee Application/ Review and transmit Statements in LEDES to Hatty Yip.
06/30/20	J.A. Moe, II	0.80	479.40	B160	/Dentons' Fifth Interim Fee Application/ Exchange E-Mails with Sandra McCandless, E-Mail to Sam Alberts and E-Mail to Karleen Murphy on sections of the Fee Application (.20); review case on Response to Motion For Relief From Stay (.10); confer with Karleen Murphy (.20); telephone call with Sandra McCandless on section, and identify and transmit section prepared for Fourth Interim Application (.20); telephone call with Karleen Murphy on section of the Fee Application Ms. Murphy is preparing (.10).
06/30/20	A. Shiran	0.70	360.15	B160	Assist with preparation of interim fee application.
<b>Subtotal</b>		<b>39.60</b>	<b>17,928.11</b>		
<b>Less Discount to Client</b>			<b>(9,314.00)</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B180 - Avoidance Action Analysis**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/06/20	S. Maizel	0.40	320.00	B180	Telephone conference with BRG, FTI, etc. re preferences.
	<b>Subtotal</b>	<b>0.40</b>	<b>320.00</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/03/20	T. Moyron	0.20	119.85	B185	Analyze correspondence regarding equipment settlement re Nant (.1); prepare email to R. Adcock. et al. re same (.1).
06/04/20	T. Moyron	0.30	179.78	B185	Analyze P. Saba, et al., emails re equipment settlement (.2); prepare email re same (.1).
06/17/20	T. Moyron	0.30	179.78	B185	Analyze and prepare draft settlement agreement re Nant (.2); prepare email to P. Chadwick, et al. re same (.1).
06/18/20	T. Moyron	0.30	179.78	B185	Analyze Nant settlement motion and comments (.2); analyze related emails (.1).
06/26/20	C. Doherty, Jr.	1.90	710.60	B185	Prepare 7th Lease Extension Motion.
	<b>Subtotal</b>	<b>3.00</b>	<b>1,369.79</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/03/20	J.A. Moe, II	0.20	119.85	B190	/Mesha Sanford v. Verity/ Preliminarily review the Complaint; exchange E-Mails with Karleen Murphy on defense counsel An Ruda and Elina Tilman.
06/04/20	J.A. Moe, II	0.10	59.93	B190	/Eddie Gonzalez v. Verity/ Review letters from two insurers on possible claims and coverage.
06/07/20	S. Maizel	0.70	560.00	B190	Review and revise motion re SCFHP offset
06/09/20	G. Medina	0.50	146.63	B190	Pull and send 9019 motion and orders filed by debtor at the request of L. Macksoud.
06/09/20	J.A. Moe, II	0.10	59.93	B190	/Lisa Swain v. Seton/ Review E-Mail on Case Management Conference, review notice, and review E-Mail from Karleen Murphy.
06/10/20	K. Murphy	0.30	124.95	B190	Confer with Eliman Tilman by telephone and email further discuss new CT Corporation procedure re medical and employment records subpoenas, and service of summons and complaints.
06/10/20	J.A. Moe, II	0.50	299.63	B190	/Mesha Sanford v. Verity/ Review Joel Glaser's letter on service in behalf of Michael Schweitzer, and exchange E-Mails on responding to letter (.20); conference telephone call with An Ruda, Elina Tilman and Tania Moyron on responding to letter from Mr. Glaser (.30)
06/16/20	J.A. Moe, II	0.20	119.85	B190	/Mesha Sanford v. Verity/ Review letter from Joel Glaser and prepare draft letter to Mr. Glaser on not accepting service in behalf of Michael Schweitzer.
06/16/20	K. Murphy	0.30	124.95	B190	/ Andrade/ Analyze notice form CT Corporation re medical records subpoena to VHS and download/analyze subpoena (.1); telephone call with Elina Tilman re the same (.1); and draft email to Verity team advising of subpoena details (.1).
06/17/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Review and correct the letter to Paul Glaser.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/22/20	J.A. Moe, II	0.60	359.55	B190	/Mesha Sanford v. Verity/ Telephone call with Luzann Fernandez and Kerry Duffy, on language for Affirmative Defense (.10); review revised language for the Affirmative Defense and request Stipulation and Order (.10); review Stipulation and Order and return call to Kerry Duffy's office on repeating section 5 of the Order (.20); exchange additional E-Mails with Kerry Duffy and telephone call with Kerry Duffy on revised language for Order (.20).
06/24/20	T. Moyron	0.20	119.85	B190	Analyze correspondence regarding subpoenas and state court hearing.
06/24/20	K. Murphy	1.00	416.50	B190	Conducted research from Rutter Guide and CCP regarding required procedures for subpoenas to hospitals for medical and employment records, and notice to consumer as required to analyze and distribute to Verity Team the CT Corporation subpoenas and advise if proper procedural and substantive requirements are met by the party sending the subpoena.
06/24/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Lewis Gordon / Analyze notice from CT Corporation for subpoenas for medical records and analyze subpoena (.1) and analyze emails from Elina Tilman, Hope Levy Biel, and Karen Chapman re the same (.1).
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Review upcoming late July Status Conference and E-Mail to Karleen Murphy on July 29th hearing.
06/30/20	J.A. Moe, II	0.10	59.93	B190	/Rosanna Frothmann/ Review Notice received from the Estate Department, and telephone call with Karleen Murphy on possible patient connection; review E-Mails exchanged with Karen Chapman.
06/30/20	K. Murphy	0.30	124.95	B190	/ Estate of Rosanna Forthmann / Analyze email enclosing trust and estate pleading documents for Rosanna Forthman and analyze documents (.1); telephone call to John Moe re the same (.1); and draft inquiry to Karen Chapman to determine if Forthmann was treated at any of the hospitals (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
	<b>Subtotal</b>	<b>5.50</b>	<b>2,899.66</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B200 - Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	J.A. Moe, II	0.20	119.85	B200	Review Tania Moyron's E-Mail on status of document retention, then preliminarily review the document retention Motions, and E-Mail on authority.
06/24/20	D. Pina	3.50	1,115.63	B200	Communications with R. Richards regarding request for court filings related to the retention and disposition of patient and non-patient records (.2); analyzed case docket and identified related court filings (1.8); commenced summarizing provisions in motions detailing protocols for retention and disposition of records (.8); summarize findings and furnish copies of court filings to R. Richards (.7).
06/25/20	J.A. Moe, II	0.90	539.33	B200	/Records Retention/ Review Bob Richard's analysis of the records' issue raised by Jones Day in regard to the Plan Of Liquidation, and telephone call to Mr. Richard's office on medical records retention (.20); exchange E-Mails with Peter Chadwick on records retention and responding to Jones Day's proposed language for the Plan (.20); brief telephone call with Bob Richards on records retention (.10); review additional E-Mails to and from Tania Moyron on records retention (.10); conference telephone call with Dentons and BRG personnel on records retention and Jones Day's objection to the Plan (.30).
06/25/20	R. Richards	0.40	289.20	B200	Internal call re records retention.
06/25/20	T. Moyron	0.40	239.70	B200	Conference call with P. Chadwick, et al. re document retention orders and requests.
<b>Subtotal</b>		<b>5.40</b>	<b>2,303.71</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	C. Doherty, Jr.	1.20	448.80	B220	Prepare revisions to Draft PGBC Agreement (.8); discuss same with Ms. Moyron on call (.2); provide information re CNA mediation (.2)
	<b>Subtotal</b>	<b>1.20</b>	<b>448.80</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B230 - Financing/Cash Collections**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	C. Montgomery	0.10	80.00	B230	Communications with T. Conner regarding payment of CSCDA expenses.
06/06/20	C. Montgomery	0.40	320.00	B230	Communications with T. Conner regarding CSCDA 2005 bond expense payment invoice and review 2005 Bond Indenture re same.
06/09/20	S. Maizel	0.10	80.00	B230	Telephone conference with M. DeLuca re 2005 bond issues.
06/11/20	C. Montgomery	0.40	320.00	B230	Participate in 2005 Lender call with T. Moyron, P. Ricotta, A. Turnbull, S. Maizel, D. Galfus, P. Chadwick.
06/18/20	K.M. Howard	0.40	100.30	B230	/Committee Litigation/ Analysis of the Stipulation of UCC of Verity Health System and Verity MOB Financing II, LLC extending Challenge Deadline and reviewed and revised Critical Dates Memorandum.
06/18/20	K.M. Howard	0.40	100.30	B230	/Committee Litigation/ Analysis of Stipulation by UCC of Verity Health System and Verity MOB Financing, LLC extending Challenge Deadline and reviewed and revised Critical Dates Memorandum.
06/22/20	L. Macksoud	0.20	87.55	B230	Confer with C. Montgomery re NDA amendments
06/22/20	K.M. Howard	0.40	100.30	B230	/Committee Litigation/ Analysis of the order approving the stipulation between Verity MOB Financing II and UCC to extend challenge deadline and reviewed and revised Critical Dates Memorandum.
06/22/20	K.M. Howard	0.40	100.30	B230	/Committee Litigation/ Analysis of the order approving the stipulation between Verity MOB Financing LLC and UCC to extend challenge deadline and reviewed and revised Critical Dates Memorandum.
06/23/20	L. Macksoud	0.30	131.33	B230	Confer with secured lenders' counsel re NDAs.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	L. Macksoud	0.40	175.10	B230	Emails with bank counsel re NDA extensions (.2), draft amendment and confer with D. Bleck re same (.2)
	<b>Subtotal</b>	<b>3.50</b>	<b>1,595.18</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B240 - Tax Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	J.A. Moe, II	0.10	59.93	B240	Review exchange of multiple E-Mails on taxes and Washington State,
	<b>Subtotal</b>	<b>0.10</b>	<b>59.93</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B250 - Real Estate**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	A.C. Chang	0.50	312.50	B250	Conference with T.Moryon, S.Maizel and C.Montgomery regarding security interest and beneficial interest issues for bondholders, potential issues related to merger of title doctrine.
	<b>Subtotal</b>	<b>0.50</b>	<b>312.50</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B260 - Board of Directors Matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/22/20	C. Montgomery	0.10	80.00	B260	Communications regarding board meeting.
06/26/20	S. Maizel	0.30	240.00	B260	Telephone conference with Board re postconfirmation roles and other issues.
	<b>Subtotal</b>	<b>0.40</b>	<b>320.00</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	N. Koffroth	0.50	250.75	B300	Participate in call with R. Adcock, P. Chadwick, et al. re claims (0.3); participate in call with P. Chadwick and T. Moyron re claims (0.2)
06/05/20	K.M. Howard	0.30	75.23	B300	Analysis of the court's order granting emergency motion to set administrative expense claims bar date and reconciled same with Critical Dates Memorandum.
06/10/20	J.A. Moe, II	0.20	119.85	B300	Telephone call with Hope Levy-Biehl, on the consequences of the SIR in regard to employment law related claims, and differentiation in the SIR based on the Claim, then discuss with Ms. Levy-Biehl the management of the Superior Court Litigation.
06/10/20	J.A. Moe, II	0.10	59.93	B300	In consultation with Karleen Murphy, prepare E-Mail on savings realized in connection with resolution of Litigation Matters, but necessity to confer on calculation.
06/14/20	J.A. Moe, II	0.40	239.70	B300	Review Tania Moyron's question on payment of fees in defense of litigation, then telephone call to An Ruda on implication of the SIR (.20); prepare E-Mail to Ms. Moyron and Malka Zeefe on payment of SIR on postpetition claims (.20).
06/15/20	J.A. Moe, II	1.10	659.18	B300	In regard to the review of Administrative Claims in connection with the Plan, prepare initial analysis of Administrative Claims filed by Administrative Claimants in response to the October 7, 2020 Bar Date.
06/15/20	T. Moyron	0.40	239.70	B300	Exchange emails with BRG re admin claims call (.1); conference call with BRG, J. Moe, et al. re estimated admin. claims (.3).
06/16/20	K. Murphy	1.30	541.45	B300	Telephone call with John Moe re calculation of administrative claims for effective date under the Plan.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	J.A. Moe, II	0.20	119.85	B300	In regard to "formal" Administrative Claims filed against the debtors, review the first draft of the Chart on such Claims and confer internally on reformulating the Chart (10); telephone call to Karleen Murphy and exchange E-Mails with An Ruda on resolution of the Gonzalez Case (.10).
06/16/20	J.A. Moe, II	0.30	179.78	B300	E-Mail to David Galfus on preparing an Analysis of Administrative Claims, reviewing OCP Claims, SIR Claims and Administrative Claims (.20); confer with internal personnel on creating list on Administrative Claims (.10).
06/16/20	J.A. Moe, II	1.30	779.03	B300	Extended conference call with Karleen Murphy reviewing and calculating the amount of the potential administrative claims related to the SIR on employment related claims, in regard to determining the amount of Administrative Claims.
06/17/20	J.A. Moe, II	0.50	299.63	B300	In regard to review of the Administrative Claims in connection with the Plan, telephone call with Elina Tilman and Karleen Murphy on claims asserted by and litigation filed in behalf of Cynthia Sorto, Mike Fayfel, Elizabeth Siguian and Patricia Aliasis.
06/17/20	K. Murphy	1.00	416.50	B300	Telephone call with John Moe and Elina Tilman re various questions re Employment Claims for calculation of administrative claims for effective date under the Plan.
06/17/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call returned from An Ruda on Leonard Harris v. St. Francis, and insuring Sorto and Sanford Cases are considered.
06/17/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, preliminarily review two Charts on such Claims (Administrative Claims and 503(b)(9) Claims) received from Andres Estrada.
06/17/20	L. Macksoud	0.30	131.33	B300	Confer with T. Moyron re settlement stipulation

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	M. Zeefe	1.30	624.33	B300	Review and track claims objections.
06/17/20	R. Richards	0.30	216.90	B300	Emails re open claims processing items in connection with Plan.
06/17/20	T. Moyron	0.70	419.48	B300	Exchange emails with BRG re claims (.1); analyze major claims and related charts re voting deadline (.6).
06/18/20	K. Murphy	0.60	249.90	B300	Further telephone call with John Moe re calculation of administrative claims for effective date under the Plan.
06/18/20	K.M. Howard	0.30	75.23	B300	Email exchange with J. Moe regarding insured claims (.1); reviewed and culled spreadsheets containing requested information (.1); followup telephone conference with J. Moe regarding same (.1).
06/18/20	S. Maizel	0.30	240.00	B300	Telephone conference with J. Moe and C. Montgomery re class claims.
06/18/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Administrative Claims in connection with the Plan, review the decision on the Waheed Wahidi Motion, and exchange E-Mails with Claude Montgomery on conferring on Waheed Wahidi's Claims (.20); conference telephone call with Claude Montgomery and Sam Maizel on claims asserted by Waheed Wahidi (.20).
06/18/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Administrative Claims in connection with the Plan, consider Chart and separate Excel Spreadsheet created by John Schlant, on Administrative Claim (.20); telephone calls with Mr. Schlant on Spreadsheet and totals, and review two revisions to the Spreadsheet (.20).
06/18/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review DFEH Complaint alleging pre and post petition discrimination.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/18/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review the letter from Craig Ackerman on allegations asserted to have occurred before the Petition was filed, then review E-Mails on Mike Fayfel's prepetition employment; E-Mail to Karleen Murphy on Proof of Claim.
06/18/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review Stipulation resolving Claims of Cardinal Health and allowance of 503(b)(3) Claim.
06/18/20	C. Montgomery	0.30	240.00	B300	Phone call with J. Moe and S. Maizel re Wahidi class administrative claims issue.
06/18/20	J.A. Moe, II	0.60	359.55	B300	In regard to the review of Administrative Claims, review with Karleen Murphy the List of EPL Claims and assessing the SIR.
06/19/20	T. Moyron	0.20	119.85	B300	Analyze correspondence related to certain claims subject to objection.
06/19/20	K. Murphy	0.10	41.65	B300	/Sodexo/ Continued conference with John Moe re calculation of administrative claims for effective date under the Plan.
06/19/20	K. Murphy	0.20	83.30	B300	/Fayfel/ Analyze emails from Karen Chapman re insurance issue (.1) and continued conference with John Moe re calculation of administrative claims for effective date under the Plan (.1).
06/19/20	K. Murphy	0.30	124.95	B300	/ Sodexo / Analyze complaint to determine nature of case and whether matter is under EPL claim and status of reporting date (.1); draft email to John Moe re summary of the same (.1); and confer with John Moe re same (.1).
06/19/20	K.M. Howard	0.80	200.60	B300	Telephone conference with J. Moe regarding administrative claims including fees incurred by professionals for March and April 2020 (.2); reviewed notices of monthly fee applications for March and April and prepared chart reflecting fees incurred by professionals at 100% (.5); prepared email to J. Moe regarding findings (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	R. Richards	0.30	216.90	B300	Call with John Moe on open administrative, priority and large claims and follow up emails re same.
06/19/20	K. Murphy	2.00	833.00	B300	Prepare updates to Verity Chart re calculation of administrative claims for effective date under the Plan.
06/19/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of the Administrative Claims' Charts in connection with the Plan, review the Claims, in general, and Tax Claims, in particular, then telephone call to Bob Richards on amount of the Tax Claims (.20); obtain and review the list of 503(b)(9) Claims (.10).
06/19/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review Tax Claims asserted by the State of California, and review with Bob Richards the analysis of and reduction concerning the Tax Claims.
06/19/20	J.A. Moe, II	0.20	119.85	B300	In regard to the overall assessment of Administrative Claims in connection with the Plan, review and outline six categories of claims, and review current calculation of the SIR on postpetition claims.
06/19/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, confer with Kathryn Howard on calculating one segment of Administrative Claims.
06/19/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review information on Claims asserted by Mike Fayfel; telephone call with Karleen Murphy on assessing claims asserted by Mr. Fayfel's attorney.
06/19/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review with Karleen Murphy the status of and setting amount on the Claims filed by Mike Fayfel.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of the Administrative Claim in connection with the Plan, confer with Karleen Murphy on Litigation filed by USC against Verity, and the status of the Claim.
06/19/20	S. Maizel	0.20	160.00	B300	Telephone conference with John Moe and C. Montgomery re class action claims issue.
06/19/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, confer with Karleen Murphy the Sodexco Claim asserting a breach of contract prepetition claim; review E-Mail on Ted Hopper's previous comments on Sodexco.
06/20/20	R. Richards	0.70	506.10	B300	Review prior information exchanged with State of California on tax claims and status emails (0.4); check status of State of California claims on KCC website (0.2); follow up with State of California regarding timing of amending its proofs of claim (0.1).
06/21/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review John Schlant's Chart on Ordinary Course Professional fees.
06/22/20	J.A. Moe, II	1.80	1,078.65	B300	In regard to the review of Administrative Claimants in connection with the Plan, prepare E-Mail Memorandum on the six categories of Administrative Claims, the amounts of such Claims, and recommendations on how to proceed to resolve the Claims (1.20); telephone call with Jon Emerson on resolution of Claims of Administrative Claims and 503(b)(9) Claims (.30); review Tania Moyron's response and telephone call returned to Bob Richards on reconciling and resolving both 503(b)(9) Claims and Administrative Claims (.10); commence process of creating merged Chart on Claimants asserting both 503(b)(9) Claims and Administrative Claims (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

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06/22/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call with Elina Tilman on two new claims, then review new DFEH claims filed by Valerie Angulo and Sofia Santiago, and exchange E-Mails with Ms.Tilman on claims to be included in Chart and coverage (.20); review new Complaint filed by Vilma Sanchez against Seton, and E-Mail to Karleen Murphy on inclusion in the Chart (.20).
06/22/20	T. Moyron	0.30	179.78	B300	Analyze correspondence regarding claims (.2); reply to same (.1).
06/23/20	K. Murphy	0.80	333.20	B300	Telephone call with John Moe, An Ruda, and Elina Tilman re analysis of potential administrative claim amount for Employment Litigation matters (.5); and post conference call debrief with John Moe re further action the same (.3).
06/23/20	K. Murphy	0.20	83.30	B300	Further telephone call with John Moe re calculation of administrative claims for effective date under the Plan re figures for Natalie Nguyen (.1) and Mike Fayfel matter (.1).
06/23/20	K. Murphy	1.50	624.75	B300	Prepare further edits to chart for Verity Employment Litigation and Other Employment Claims for Plan, including adding Santiago and Angula matters to the same.
06/23/20	K. Murphy	0.20	83.30	B300	Further confer with John Moe re Raj matter to discuss case status as relevant to calculation of SIR on administrative claims (.1); and prepare additions to chart re the same (.1).
06/23/20	K. Murphy	1.00	416.50	B300	Prepare further revisions and finalize chart with calculation of administrative claims for effective date under the Plan.
06/23/20	K. Murphy	0.20	83.30	B300	/ Makem / Analyze emails from Elina Tilman enclosing new DFEH Complaint and analyze Complaint (.1); add new case to chart re calculation of SIR on administrative claims. (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	S. Maizel	0.30	240.00	B300	Telephone conference with J. Moe and C. Montgomery re claims issues.
06/23/20	J.A. Moe, II	1.00	599.25	B300	In regard to the review of Administrative Claims in connection with the Plan, conference telephone call with Tania Moyron, Sam Maizel and Nick Koffroth reviewing steps to be taken to determine the amount of each Claimant's Claims asserted in a definitive amount, and determining the amount of the Unliquidated Claims (.60); prepare draft of Chart on Unliquidated Claims and assignment to Attorneys for review (.20); review and identify Claims that are withdrawn, confirming withdrawal of Claim of Catherine Wolferd (.20).
06/23/20	J.A. Moe, II	1.40	838.95	B300	In regard to the review of Administrative Claims in connection with the Plan, review with Karleen Murphy the necessity to complete updates to the Chart on EPL Claims, and upcoming call with An Ruda on Administrative Claims and scheduling conference call (.10); review and respond to draft Chart on both Administrative Claims and 503(b)(9) Claims (.10); conference telephone call with An Ruda, Elina Tilman and Karleen Murphy on issue of Administrative Claims and scheduling conference call with other members of Dentons to discuss the SIR (.50); telephone call with Karleen Murphy on completing the Chart, including discussion of specific claims (.30); review the completed Chart and confer with Karleen Murphy on Aaron Raj and review BZBM analysis (.20); review Master List and telephone call to Karleen Murphy on one addition to four claims (.20).
06/23/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of Administrative Claims, review and transmit List of 503(b)(9) Claims to Robert Richards (.20); coordinate preparation of List comparing 503(b)(9) Claims with Administrative Claims, and transmit to Mr. Richards (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Administrative Claims in connection with the Plan, prepare detailed Memorandum to An Ruda, Luzann Fernandez and Elina Tilman explaining and transmitting the List of EPL Claims and the necessity to review List in regard to setting amount of the SIR on postpetition reported EPL Claims
06/24/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, confer briefly with and exchange E-Mails with Karleen Murphy on adding the Cristina Makem v. O'Connor case to the EPL Chart.
06/24/20	J.A. Moe, II	0.80	479.40	B300	In regard to the review of Administrative Claims in connection with the Plan, E-Mail to Jon Emerson on analysis of Administrative Claims (.10); revise -- through two iterations -- the Memorandum on review and analysis of Unliquidated Administrative Claims (.50); retrieve List of Administrative Claims received from Andres Estrada, and transmit to Mr. Emerson (.20).
06/24/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Administrative Claims in connection with the Plan, revise and expand Memorandum on review of the Unliquidated Administrative Claims.
06/24/20	R. Richards	0.20	144.60	B300	Emails re California Tax claim reconciliation.
06/25/20	J.A. Moe, II	1.10	659.18	B300	In regard to the review of Administrative Claims in connection with the Plan, review and make revisions to the Memorandum on Unliquidated Administrative Claims (.40); exchange E-Mails with Jon Emerson on Administrative Claims (.10); prepare E-Mail to Tania Moyron transmitting Memorandum on Unliquidated Administrative Claims and status of review of three types of Administrative Claims (.30); telephone call with Jon Emerson on review and analysis of Administrative Claims (.10); identify and transmit to Mr. Emerson documents on resolution of Medline and Cardinal 503(b)(9) Claims (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	R. Richards	0.50	361.50	B300	Call with California tax (.2); update client (.2); emails re reconciling California tax claims (.1).
06/25/20	T. Moyron	0.10	59.93	B300	Correspond with BRG re priority claims.
06/26/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of Administrative Claims in connection with the Plan, review the seventeen Claims filed by the RPHE, and review Motion seeking allowance of Administrative Claim.
06/26/20	J.A. Moe, II	0.60	359.55	B300	In regard to the review of Administrative Claims in connection with the Plan, exchange E-Mails with Tania Moyron on, assemble and transmit RPHE Claims.
06/27/20	N. Koffroth	1.00	501.50	B300	Participate in call with D. Galfus, J. Schlant, et al. re priority claims
06/28/20	R. Richards	0.20	144.60	B300	Review additional information on reconciling claims.
06/29/20	T. Moyron	1.10	659.18	B300	Analyze claims chart re potential objectionable claims (.4); analyze prior Integrity memorandum (.3); correspond regarding document (.2); conference call with P. Chadwick re Committee and Mintz call (.2).
06/29/20	J.A. Moe, II	1.60	958.80	B300	In regard to the review of Administrative Claims in connection with the Plan, conference call with An Ruda, Luzann Fernandez and Elina Tilman on estimated amount of the SIR on postpetition claims, also reviewing the issues raised by prepetition claims reported postpetition (.80); continuing conference call with An Ruda, Luzann Fernandez and Elina Tilman analyzing claims and the SIR (.80).
06/29/20	K. Murphy	0.30	124.95	B300	Prepared further updates and finalized EPL Chart for The Plan (.2); and drat email to John Moe enclosing the same. (.1).
06/30/20	K. Murphy	0.90	374.85	B300	Telephone call with John Moe re updates to estimates of post petition EPL SIR amounts (.4); further call with John Moe re the same (.2); and prepare further updates to Verity Chart with updates (.3).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review acknowledgments from Argonaut Insurance on tender of the defense of the Claims for Mike Fayfel and Elizabeth Siquian and Natalie Nguyen.
06/30/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, confer with Karleen Murphy on necessity to update the Chart on postpetition reported EPL Claims.
06/30/20	R. Richards	0.30	216.90	B300	Call re California tax claims and emails re same.
<b>Subtotal</b>		<b>39.70</b>	<b>21,545.73</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	B. Greer	0.40	320.00	B310	Review Carefusion contracts.
06/02/20	M. Sanchez	2.00	510.00	B310	Review declarations, exhibits, and notices in preparation for filing with court.
06/03/20	B. Greer	0.60	480.00	B310	Review RE contracts.
06/04/20	B. Greer	3.20	2,560.00	B310	Verity, review GE Contracts, research re same, tc w J. Emerson re same (3.2).
06/04/20	S. Maizel	0.60	480.00	B310	Telephone conference with Paul Osborne, BRG, re CARES Act payments.
06/06/20	S. Maizel	1.00	800.00	B310	Telephone conference with S. Alberts, BRG, etc. re PBGC claim.
06/09/20	S. Maizel	0.10	80.00	B310	Review tentative ruling re Medline motion for payment of admin expense.
06/09/20	J.A. Moe, II	0.20	119.85	B310	/Medline/ Review the Tentative Ruling on Medline Motion seeking payment now of Section 503(b)(9) Claim.
06/10/20	S. Maizel	1.10	880.00	B310	Participate in telephonic hearing re Medline motion and motions re 1113.
06/15/20	N. Koffroth	0.30	150.45	B310	Draft order denying Medline administrative claim motion
06/15/20	S. Maizel	0.20	160.00	B310	Review and respond to Apogee filing re admin expense.
06/16/20	J.A. Moe, II	0.40	239.70	B310	Review Nick Koffroth's E-Mail and Voice-Message, then review the previous Administrative Bar Date Motion, entered Order and Notice, then prepare insert (.30); exchange E-Mails with Nick Koffroth and review insert in the Motion on Administrative Claims (.10).
06/22/20	M. Zeefe	0.50	240.13	B310	Review AllScripts claim and preliminary discussion re same.
06/23/20	C. Montgomery	0.20	160.00	B310	Communications with M. Zeefe re Allscripts claims objection.
06/24/20	C. Montgomery	0.20	160.00	B310	Communications with M. Zeefe regarding Allscripts documents.
06/24/20	M. Zeefe	0.10	48.03	B310	Emails re AllScripts claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	M. Zeefe	2.10	1,008.53	B310	Draft motion to approve PBGC claims settlement.
06/26/20	T. Moyron	0.50	299.63	B310	Analyze email from counsel for RPHE and prepare response thereto (.1); correspond with M. Shinderman re same (.1); correspond with S. Alberts re same (.1); analyze POCs (.2).
06/26/20	M. Zeefe	0.50	240.13	B310	Revise PBGC settlement motion.
06/28/20	S. Alberts	0.30	240.00	B310	VHS Claim. Conference with D. Galfus regarding RPHE administrative claim.
06/29/20	S. Maizel	0.40	320.00	B310	Telephone conference with creditor re status of claims process (.3); review and respond to emails re same. (.1).
06/29/20	M. Zeefe	0.90	432.23	B310	Correspondence with PBGC re finalizing settlement agreement and draft motion.
06/30/20	J.A. Moe, II	0.90	539.33	B310	In regard to the review of Administrative Claims in connection with the Plan, commence review with Karleen Murphy on changes to the estimated postpetition EPL SIR amount (.40) telephone call with Elina Tilman on Dwight Rapp (.30); continued telephone call with Ms. Murphy on changes to the SIR amount (.20).
<b>Subtotal</b>		<b>16.70</b>	<b>10,468.01</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	M. Zeefe	0.20	96.05	B320	Emails re disclosure statement and new plan settlement.
06/01/20	T. Moyron	0.50	299.63	B320	Conference call with R. Adcock re Plan and Committee request regarding BRG analysis (.2); conference calls with D. Galfus re analysis and timing (.2); prepare email regarding same (.1).
06/01/20	N. Koffroth	4.20	2,106.30	B320	Draft plan of liquidation
06/02/20	T. Moyron	2.70	1,617.98	B320	Analyze updated disclosure statement (.7); conference call regarding disclosure statement (2.0).
06/02/20	C. Montgomery	0.10	80.00	B320	Communications with N Koffroth regarding updated plan.
06/02/20	N. Koffroth	2.20	1,103.30	B320	Draft disclosure statement describing chapter 11 plan
06/02/20	N. Koffroth	3.10	1,554.65	B320	Draft plan of liquidation
06/02/20	M. Zeefe	7.60	3,649.90	B320	Revise disclosure statement (5.5); call with T. Moyron and N. Koffroth to work through same (2.1).
06/03/20	M. Zeefe	6.70	3,217.68	B320	Emails with team re disclosure statement (0.2); call with T. Moyron and N. Koffroth re same (0.8); revise same (5.7).
06/03/20	N. Koffroth	3.90	1,955.85	B320	Draft disclosure statement describing chapter 11 plan of liquidation
06/03/20	N. Koffroth	2.60	1,303.90	B320	Draft chapter 11 plan of liquidation
06/03/20	A. Sharetta	0.30	240.00	B320	Attend telephone conference call with T. Moyron regarding inserted text in section 13.1 of Plan of Liquidation relating to first priority perfected security interest (0.3).
06/03/20	T. Moyron	3.10	1,857.68	B320	Conference call with M. Zeefe, et al. re disclosure statement (.8); analyze updated disclosure statement (.4); conference call with N. Koffroth re updated POL (.8) and conference call with A. Sharreta re security interest (.3); analyze updated POL (.6); prepare emails to Mintz re POL (.1); conference call with Committee counsel (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/03/20	T. Moyron	1.20	719.10	B320	Conference with R. Adcock re status of POL and DS and discussions and other matters (.9); conference call with P. Chadwick and then D. Galfus re status of matters, preferences, etc. (.3).
06/03/20	C. Montgomery	0.10	80.00	B320	Communications with T Moyron regarding internal and external plan meetings.
06/03/20	K. Murphy	0.70	291.55	B320	Confer with John Moe re instruction to prepare list of litigation and other matters outside the Bankruptcy Court (.2); analyzed John Moe's draft of statement with required information to be provided by KFM and revised statement (.1); analyzed Verity Litigation Management Chart and Relief From Stay Charts to assemble information on totality of cases in various courts and jurisdictions to prepare for insertion into draft document (.3); and edited John Moe's draft with required information (.1).
06/03/20	J.A. Moe, II	0.70	419.48	B320	Exchange E-Mails with Malka Zeefe on preparing description of Verity's work on outside litigation, then prepare description of work performed by Verity in responding to Motions For Relief From Stay and dealing with Litigation in the Superior Court and District Courts (.40); edit and revise draft of the description for the Plan and Disclosure Statement (.20); telephone call with Karleen Murphy on editing the description of Verity's work on outside litigation (.10)
06/04/20	C. Montgomery	0.80	640.00	B320	Participate in phone conference with D Bleck, P Ricotta, T Moyron, S Maizel and N Koffroth regarding plan of liquidation (.3); phone call from D Galfus regarding use of reserve computations for 2005 calculations (.1); participate in phone call with M Shinderman, D Bleck, P Ricotta, T Moyron, S Maizel regarding plan of liquidation (.3); communications with T Moyron and A Sharetta regarding tax review issue (.1)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	A. Sharetta	2.00	1,600.00	B320	Review US treasury regulations and Revenue Procedure regarding qualification of liquidating trust under US tax rules as a result of first priority perfected security interest (1.3); attend telephone conference call with T. Moyron regarding plan of liquidation (.3); email correspondence with C. Montgomery and T. Moyron regarding tax issues presented by security interest created for benefit of certain creditors (.2); draft email of tax review (.2).
06/04/20	T. Moyron	2.10	1,258.43	B320	Conference call with Mintz, et al. re POL (.3); call with Mintz, Committee, et al. re POL (.4); analyze updated DS (1.1); coordinate circulation of POL to constituents (.3).
06/04/20	T. Moyron	0.60	359.55	B320	Analyze and prepare stipulation re POL (.4); conference call with N. Koffroth re same (.2).
06/04/20	K. Murphy	0.90	374.85	B320	Telephone call with John Moe re further edits to draft of statement of matters outside of litigation for inclusion into Plan and/or Disclosure Statement re addition of Workers' Compensation matters and Labor Grievances (.2); analyzed email from Malka Zeefe re current draft document requesting additional information re proof of claims for resolved matters (.1); and confer with John Moe re responding to the same request for additional information (.6).
06/04/20	K. Murphy	0.20	83.30	B320	Draft email to Andreas Saldavar at KCC requesting information on proof of claims for various matters to respond to request for additional information from Malka Zeefe for draft of statement of matters outside of litigation for inclusion into Plan and/or Disclosure Statement.
06/04/20	K. Murphy	0.10	41.65	B320	Further telephone call with John Moe re additional edits to second draft of statement of matters outside of litigation for inclusion into Plan and/or Disclosure Statement re addition of Workers' Compensation matters and Labor Grievances, including preparing edits during call.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	T. Moyron	1.30	779.03	B320	Conference call with N. Koffroth regarding Plan ancillary documents and project status.
06/04/20	S. Alberts	0.30	240.00	B320	VHS Plan. Review description of pension and retiree health treatment and circulate.
06/04/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, etc. re plan issues.
06/04/20	S. Maizel	0.80	640.00	B320	Telephone conference with Mintz Levin, etc. re plan issues.
06/04/20	S. Maizel	0.40	320.00	B320	Telephone conference with Mintz Levin, Milbank, etc. re plan issues.
06/04/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, etc. re plan issues.
06/04/20	S. Maizel	0.80	640.00	B320	Telephone conference with Mintz Levin, etc. re plan issues.
06/04/20	S. Maizel	0.40	320.00	B320	Telephone conference with Mintz Levin, Milbank, etc. re plan issues.
06/04/20	N. Koffroth	0.50	250.75	B320	Participate in call with counsel to secured creditors and Committee re plan of liquidation
06/04/20	N. Koffroth	1.40	702.10	B320	Draft stipulation and order re continued plan milestone (1.1); conference call with T. Moyron re same (0.3)
06/04/20	N. Koffroth	4.50	2,256.75	B320	Meeting with T. Moyron re issues related to workstreams memo (1.7); draft workstreams memo (2.8)
06/04/20	K. Murphy	0.20	83.30	B320	Prepare edits to draft of statement of matters outside of litigation for inclusion into Plan and/or Disclosure Statement re Workers' Compensation matters, Labor Grievances, and Administrative Actions for John Moe's review.
06/04/20	J.A. Moe, II	1.40	838.95	B320	Confer with Karleen Murphy on section of the Plan and/or Disclosure Statement, on work preformed by Verity in regard to responding to Motions For Relief From Stay and monitoring -- and where necessary litigating -- cases in the Superior and Federal Courts (.20); review and revise -- through two iterations --the proposed section (.40); review revised section and

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					transmit to Malka Zeefe, also telephoning Ms. Zeefe on proposed section (.10); exchange E-Mails with Malka Zeefe on additional analysis, and extended conference with Karleen Murphy identifying cases where Proofs of Claims were filed, and deciding on action to take to perform an analysis (.60); review with Karleen Murphy the expanded description of outside litigation for the Plan and/or Disclosure Statement, making minor modifications (.10).
06/04/20	J.A. Moe, II	0.10	59.93	B320	Exchange E-Mails on Ballots for the Plan, and preliminarily review the current Ballots.
06/04/20	M. Zeefe	3.40	1,632.85	B320	Revise disclosure statement (0.4); draft motion to approve disclosure statement (3.0).
06/05/20	M. Zeefe	0.50	240.13	B320	Revise disclosure statement.
06/05/20	K. Murphy	1.20	499.80	B320	Prepare for drafting summary revisions of insert for Plan and Disclosure Statement re settlement information for State and Federal Court cases outside of bankruptcy by conferring with John Moe re the same (.3); draft multiple emails to Andres Saldavar of KCC to confirm existence of Proof of Claims and respective amounts for multiple cases and analyze Mr. Saldavar's Excel Spreadsheet with requested information (.3); draft further emails to Mr. Saldavar seeking follow up information and analyze updated Excel spreadsheets re same (.3); draft email to Elina Tilman seeking settlement information re various employment cases and response (.1); draft emails to Haig Arabian and Jessica Cynowitz and analyze response re disposition of various medical malpractice cases as to settled or dismissed (.2).
06/05/20	T. Moyron	0.50	299.63	B320	Conference call with A. Sharetta, et al. re grantor trust and request for security interest.
06/05/20	T. Moyron	0.20	119.85	B320	Conference call with J. Moe, et al. re plan ballots.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	T. Moyron	0.20	119.85	B320	Conference call with P. Chadwick regarding Medline and plan matters.
06/05/20	T. Moyron	0.60	359.55	B320	Conference call with N. Koffroth re plan matters and project memo.
06/05/20	T. Moyron	2.10	1,258.43	B320	Conference call with P. Chadwick, D. Galfus, et al. re plan and case matters (1.3); conference call with J. Behrens re Plan questions (.8).
06/05/20	S. Alberts	0.20	160.00	B320	VHS Plan. Review comments to Plan insert on pension and retiree health and made further changes.
06/05/20	S. Maizel	0.20	160.00	B320	Telephone conference with J. Moe, etc. re plan ballots issues.
06/05/20	S. Maizel	1.30	1,040.00	B320	Telephone conference with T. Moyron, etc. re plan preparation issues.
06/05/20	C. Montgomery	0.60	480.00	B320	Participate in phone conference with T Moyron, S Maizel and A Sharetta regarding tax implications of possible liquidating trust security interests (.5); communications with T Moyron and P Chadwick regarding plan preference review (.1)
06/05/20	K.M. Howard	0.40	100.30	B320	Analysis of Order and Stipulation extending the Deadline for Debtors to file Plan and Disclosure and reviewed and revised Critical Dates Memorandum accordingly.
06/05/20	N. Koffroth	0.60	300.90	B320	Draft stipulation and order re plan milestone
06/05/20	A. Sharetta	1.00	800.00	B320	Attend telephone conference call with C. Montgomery, T. Moyron S. Maizel, and N. Koffroth regarding tax issues with respect to liquidating trust and first perfected security interest (.5); review certain IRS administrative authority regarding liquidating trusts (.5).
06/05/20	N. Koffroth	0.70	351.05	B320	Participate in internal call re trust beneficial interests (0.5); participate in internal call re ballots (0.2)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	J.A. Moe, II	0.50	299.63	B320	Consider and outline the development of Ballots for the Plan Of Liquidation (.20); telephone call with Sam Maizel, Tania Moyron and Nick Koffroth on reformulating Ballots (.20); preliminarily review the Plan in connection with revising the Ballots (.10).
06/05/20	J.A. Moe, II	0.70	419.48	B320	In regard to the section of Plan and/or Disclosure Statement describing outside litigation, review the updated and expanded section and transmit to Malka Zeefe for inclusion in the Plan and/or Disclosure Statement (.10); review E-Mails from Elina Tilman and Andres Estrada, and confer with Karleen Murphy on estimating the monetary benefit by way of the settlements/dismissals (.20); additional call with Ms.Murphy on additional cases that have settled, and obtain settlement amounts (.20); additional call with Ms. Murphy on third Chart on claims and continuing analysis for the Plan and/or Disclosure Statement (.20).
06/05/20	J.A. Moe, II	0.90	539.33	B320	/Ballots/ Prepare first set of revised 2020 Ballots, for Classes 2 through 10, and first review of the revised settlement, exculpation, release and non recourse provisions of the Plan (for later inclusion in the Ballots).
06/06/20	C. Montgomery	0.80	640.00	B320	Phone call with D Galfus regarding PBGC plan issue (.2); participate in phone call with J Behrens and FTI with T Moyron, DGalfus, P Chadwick regarding role of preference recoveries under plan waterfall (.4); follow up phone call from DGalfus regarding PBGC and RPHE plan settlement issues (.2)
06/06/20	S. Alberts	1.50	1,200.00	B320	VHS Plan. Communicate by email (.1); review prior proposed treatment of PBGC and RPHE (.4); send materials in advance of call along with assessments (.6); confer with working group (.4).
06/06/20	M. Zeefe	0.30	144.08	B320	Emails with S. Alberts re PBGC and RPHE claims (0.2); correspondence with N. Koffroth re disclosure statement (0.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/06/20	N. Koffroth	1.00	501.50	B320	Participate in call with R. Adcock, P. Chadwick, et al. re plan settlement
06/06/20	N. Koffroth	0.40	200.60	B320	Participate in call with Committee counsel, BRG, et al. re preference recoveries
06/07/20	N. Koffroth	1.00	501.50	B320	Participate in internal call re plan settlement
06/07/20	S. Alberts	1.70	1,360.00	B320	VHS Plan. Review and comment on proposed Plan treatment offer for PBGC and RPHE and provide comments (.5); receive comments and follow up (.2); confer with working group concerning options and PBGC proposal (1.0).
06/07/20	S. Maizel	1.00	800.00	B320	Telephone conference with BRG, etc. re PBGC claim treatment in confirmation context.
06/07/20	T. Moyron	2.00	1,198.50	B320	Conference call with BRG, S. Maizel, et al. re PBGC (1.0); conference call with J. Behrens re plan (.1); conference call with R. Adcock re request from Committee re circulation (.3); analyze emails from BRG re analysis (.2); analyze matters related to priority payments re plan (.4).
06/07/20	C. Montgomery	1.30	1,040.00	B320	Review 2019 advisors outline of PBGC claims and issues (.2); review Plan waterfall (.1); participate in phone conference with D Galfus, S Alberts, J Schlant, P Chadwick, S Maizel and T Moyron regarding range of solutions for a PBGC plan settlement (1.0)
06/07/20	K. Murphy	2.00	833.00	B320	Prepare draft chart for insert for Plan and/or Disclosure Statement re settlement information for State and Federal Court cases outside of bankruptcy (1.9) and draft email to John Moe enclosing the same for review (.1).
06/08/20	T. Moyron	1.50	898.88	B320	Call with PBGC re treatment and plan (.6); call with D. Galfus and S. Alberts re same (.2); analyze emails from D. Galfus and attachment (.2); prepare emails re same (.1); analyze matters related to plan (.4).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/08/20	S. Alberts	1.50	1,200.00	B320	VHS Plan. Review and provide comments to issues script from D. Galfus (.4); follow up with D. Galfus (.3); communicate with PBGC on Plan and settlement of claim (.6) and follow up with co-counsel and D. Galfus (.2).
06/08/20	K. Murphy	0.60	249.90	B320	Telephone call with John Moe re further edits to settlement chart analysis for statement on matters outside of litigation for inclusion into Plan and/or Disclosure Statement (.2); analyze further emails from defense litigation counsel re case disposition for Zavala and Naope matters (.1); further confer with Andres Saldavar from KCC re Princess Naope claim number and amount (.1); and prepare edits/finalization of settlement chart analysis (.2).
06/08/20	S. Maizel	0.60	480.00	B320	Telephone conference with PBGC re treatment of their claim in plan.
06/08/20	A. Sharetta	3.00	2,400.00	B320	Tax research regarding IRS administrative authority relating to secured claimholders in liquidating trusts (2); reviewing IRS authorities, disclosure statements, and secondary authorities regarding trust beneficiary with secured claims or security interest in trust assets (1).
06/08/20	C. Montgomery	0.10	80.00	B320	Communications with D Galfus and T Moyron regarding PBGC talking points for plan settlement.
06/08/20	J.A. Moe, II	0.60	359.55	B320	In regard to the section of the Plan and/or the Disclosure Statement on responsibility for litigation filed outside the Bankruptcy Court, review update on Maria Zavala v. St. Francis (.10); confer with Karleen Murphy on Chart on Claims, and Princess Naope's Claim (.20); review E-Mails to and from Andres Estrada on Princess Naope Claim (.10); additional telephone calls with Karleen Murphy, including review of the completed Chart and amount saved (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/08/20	J.A. Moe, II	1.20	719.10	B320	Review revisions to the Ballots (.10); review sections of the Ballots on injunctions, releases, exculpation and waiver, and integrate revised sections of the Plan into all the Ballots (.60); confer with Andres Estrada on preparation of the Ballots (.10); preliminarily review the revised Ballots and delete section of two Ballots (.40);
06/08/20	N. Koffroth	0.60	300.90	B320	Participate in call with counsel to PBGC re plan issues
06/08/20	N. Koffroth	3.60	1,805.40	B320	Draft disclosure statement describing chapter 11 plan of liquidation
06/09/20	N. Koffroth	0.40	200.60	B320	Participate in call with R. Adcock, P. Chadwick, et al. re Committee request
06/09/20	J.A. Moe, II	0.20	119.85	B320	Telephone call with Karleen Murphy on review of Chart on analysis of claims, whether all settled claims involved relief from stay, and amount of savings resulting from settlement, all in regard to drafting section for the Plan and/or the Disclosure Statement on the amount of litigation claims that have been resolved.
06/09/20	M. Zeefe	0.30	144.08	B320	Revise motion to approve disclosure statement.
06/09/20	C. Montgomery	1.50	1,200.00	B320	Phone call with T Moyron regarding possible committee challenges to plan and related 1113 issues (.3); phone calls with D Galfus regarding PBGC plan settlement and Committee proposal (.6); communications with T Moyron regarding Committee proposal (.1); participate in phone conference with R Adcock, P Chadwick, T Moyron, D Galfus and S Maizel regarding Committee plan proposal (.5);
06/09/20	A. Sharetta	2.40	1,920.00	B320	Further tax research regarding IRS administrative authority relating to secured claimholders in liquidating trusts (2); draft email to C. Montgomery and T. Moyron regarding IRS conclusions with respect to secured claimholder in liquidating trust (.4).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	J.A. Moe, II	1.80	1,078.65	B320	Review Ballots and mark further revisions in accordance with terms used in the Amended Joint Chapter 11 Plan Of Liquidation (.40); review the redlined Joint Chapter 11 Plan Of Liquidation (.90); exchange E-Mails with Dave Hartie and E-Mail to Tania Moyron on KCC's request for information on timing (.20); telephone call from David Hartie discussing issue of timing and the necessity for KCC to review the proposed ballots and KCC's possible revisions (.30).
06/09/20	T. Moyron	1.20	719.10	B320	Conference call with J. Behrens re Committee requests (.3); prepare email to R. Adcock, et al. re Committee requests (.2); conference call with R. Adcock, P. Chadwick, et al. re Committee requests re plan (.5); conference call with P. Ricotta re Committee requests (.2).
06/09/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re UCC response to plan proposal.
06/09/20	S. Maizel	0.50	400.00	B320	Telephone conference with BRG, R. Adcock, etc. re UCC response to plan proposal.
06/09/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron and N. Koffroth re UCC response to plan proposal.
06/10/20	S. Alberts	0.60	480.00	B320	VHS. Plan. Email (.1) and confer with D. Galfus about Plan issues and pensions (.5).
06/10/20	C. Montgomery	0.80	640.00	B320	Participate in phone conference with T Moyron, S Maizel, D Bleck, P Ricotta and N Koffroth re plan issues (.6); communications with T Moyron, N Koffroth and J Chesley regarding director releases (.1); phone call with T Moyron re same (.1)
06/10/20	T. Moyron	0.60	359.55	B320	Conference call with Mintz, BRG, et al. re Committee requests.
06/10/20	T. Moyron	0.50	299.63	B320	Correspond with J. Chesley re plan matters (.1); analyze issues related to releases (.4).
06/10/20	M. Zeefe	3.90	1,872.98	B320	Revise disclosure statement (3.1); call with T. Moyron and N. Koffroth to review lender comments received to same (0.8).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	S. Maizel	0.50	400.00	B320	Review and respond to emails re revisions to draft disclosure statement.
06/10/20	S. Maizel	0.10	80.00	B320	Review draft liquidation analysis for disclosure statement.
06/10/20	S. Maizel	0.60	480.00	B320	Telephone conference with Mintz Levin, etc. re UCC demands re Plan.
06/10/20	N. Koffroth	0.60	300.90	B320	Participate in call with counsel to secured creditors re Committee comments
06/10/20	N. Koffroth	0.20	100.30	B320	Participate in internal call re plan issues with R. Adcock, P. Chadwick et al.
06/10/20	N. Koffroth	1.70	852.55	B320	Draft plan of liquidation
06/10/20	T. Moyron	1.50	898.88	B320	Conference call with M. Shinderman re Committee proposal (.4); conference call with R. Adcock and D. Galfus re Committee request (.2); conference call with M. Zeefe, et al. re Mintz comments on DS (.9).
06/10/20	J.A. Moe, II	1.10	659.18	B320	Review E-Mails from Dave Hartie and Andres Estrada, on their comments on the Ballots, and review proposed changes to Class 4 Ballots (.20); telephone call with Dave Hartie reviewing changes to the Class 4 Ballots (.40); E-mail to Tania Moyron on Ballots and solicitation procedures (.10); commence revisions to the Ballots (.20); review language on receipt of payments, and in consultation with Mr. Hartie, revise language included on all Ballots (.20).
06/11/20	S. Maizel	0.60	480.00	B320	Telephone conference with M. Isaacs, etc. re best interests of creditors discussion in disclosure statement.
06/11/20	S. Maizel	1.20	960.00	B320	Telephone conference with C. Montgomery, etc. re liquidation analysis and other plan issues.
06/11/20	S. Maizel	0.20	160.00	B320	Telephone conference with Tania Moyron, etc. re plan issues.
06/11/20	S. Maizel	1.10	880.00	B320	Telephone conference with BRG, etc. re liquidation analysis.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	J.A. Moe, II	2.00	1,198.50	B320	Review updated and latest version of the revised Ballots, and make minor revisions to the Ballots, with emphasis on the placement of dates, correct pagination, and deletion from each Ballot of redundant statement on release (.40); review the Amended Plan on Section 13 Injunctions (.20); continue to work on and revise, and complete, next draft of the Ballots, and transmit to Dave Hartie, Andres Estrada, Tania Moyron and Nick Koffroth for review (1.40).
06/11/20	J.A. Moe, II	0.10	59.93	B320	In regard to the section of the Plan and/or Disclosure Statement discussing the litigation outside the bankruptcy court, confer with Malka Zeefe on reduction in claims asserted against the debtors through settlement of litigation and resolution of claims.
06/11/20	C. Montgomery	7.70	6,160.00	B320	Communications with N Koffroth, S Maizel and T Moyron regarding Disclosure statement language proposed by Mintz regarding Intercreditor Agreement, including review and revision of same (1.8); review Mintz Comments on Disclosure Statement and communications with T Moyron and N Koffroth re same (.6); review revised BRG hurdle analysis (.1) ; phone conference with TMoyron, M Zeefe, S Maizel re liquidation analysis and disclosure statement (1.2) ; phone call with S Maizel, T Moyron regarding Committee plan issues (.4); participate liquidation analysis call with D Galfus, J Schlant, T Moyron and S Maizel (1.1) ; communications with T Moyron regarding merger issues arising from deemed distribution to creditors (1.2) ; participate in phone conference with M Isaacs, T Moyron and N Koffroth regarding liquidation analysis ( .5); phone conference TMoyron, N Koffroth, and S Maizel regarding concept of merger and impact on Liquidating Trust issues (.8)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	S. Alberts	0.20	160.00	B320	VHS Plan. Receive PBGC response to proposal to get its consent to plan and brief follow up.
06/11/20	M.A. Isaacs	0.90	478.13	B320	Memos from and to Ms. Moyron re best interests test: memos to and from Mr. Koffroth re same (0.1); memo to Ms. Worthing re liquidation test and search of Squires and Shaw samples (0.1); conference call with Ms. Moyron, Messrs. Montgomery and Koffroth re Bankruptcy Code Section 721, issues related to conversion versus plan confirmation and best interests test (0.6); email to Ms. Moyron re liquidation analysis issue (0.1);
06/11/20	T. Moyron	1.10	659.18	B320	Analyze and prepare disclosure statement re best interest of creditors (.7); analyze updated BRG chart re best interest of creditors (.2); exchange emails with J. Schlant (.1); exchange emails with Mintz re DS (.1).
06/11/20	T. Moyron	0.70	419.48	B320	Conference call with M. Isaacs, et al. re best interest of creditors test.
06/11/20	T. Moyron	0.80	479.40	B320	Conference call with C. Montgomery, et al., related to merger issues re plan.
06/11/20	T. Moyron	4.40	2,636.70	B320	Internal conference call regarding Mintz comments re DS (1.2); internal conference call regarding Committee discussion re Plan (.3); conference call with BRG, C. Montgomery, et al. re best interest of creditors test (1.1); analyze email from J. Schlant re same (.1); conference call with N. Koffroth to coordinate further plan matters (.2); exchange emails with Committee and Mintz re call (.1); exchange emails with D. Galfus re best interest of creditors call (.1); analyze disclosure statement and related (.6); conference call with J. Schlant re best interest of creditors test (.2); analyze correspondence from PBGC and reply to same (.1); prepare email to R. Adcock, et al. re same (.1); conference call with D. Galfus re same (.1); analyze issues related to merger and antideficiency doctrines (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	M. Zeefe	7.20	3,457.80	B320	Calls with J. Moe re disclosure statement (0.1); call with P. Maxcy re same (0.1); call with team re best interest test (1.1); call with team and BRG re same (1.1); revise disclosure statement (4.8).
06/11/20	N. Koffroth	5.00	2,507.50	B320	Participate in calls re plan concerning internal call re liquidation analysis and SGM litigation (2.1); call with P. Chadwick, D. Galfus, et al. re liquidation analysis (1.1); call with R. Adcock, P. Chadwick et al. re insurance issues (0.3); internal call re best interests of creditors test (0.6); internal call re secured interest in trust assets (0.9)
06/11/20	N. Koffroth	3.70	1,855.55	B320	Draft disclosure statement describing chapter 11 plan
06/12/20	N. Koffroth	2.70	1,354.05	B320	Participate in calls concerning the plan re best interests of creditors test with P. Chadwick, D. Galfus, et al. (1.2); internal call re secured interests in trust assets (0.5); call with counsel to prepetition secured creditors re plan settlement (0.5); call re plan settlement with R. Adcock, P. Chadwick, et al. (0.5)
06/12/20	N. Koffroth	3.20	1,604.80	B320	Draft motion to approve disclosure statement re joint plan of liquidation
06/12/20	N. Koffroth	2.10	1,053.15	B320	Draft disclosure statement describing chapter 11 plan of liquidation
06/12/20	N. Koffroth	1.20	601.80	B320	Draft chapter 11 plan of liquidation
06/12/20	M. Zeefe	0.60	288.15	B320	Revise disclosure statement (0.4); revise motion to approve same (0.2).
06/12/20	S. Alberts	0.20	160.00	B320	VHS Plan. Communicate about PBGC settlement and plan.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	J.A. Moe, II	3.90	2,337.08	B320	Review Dave Hartie's E-Mail on minor change to the Ballots on adding CUSIP reference to first of two Class 4 Ballots, and insuring blocks on two Exhibits are recognizable, the return E-Mail and telephone call to Mr. Hartie's office on changes (.20); review and revise the Ballots to incorporate Dave Hartie's comments (.30); review Ballots to insure previous corrections are included (.30); commence line by line review of the Ballots, identifying questions and making approximately 145 revisions to the Ballots (3.10).
06/12/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re PBGC issues.
06/12/20	S. Maizel	0.50	400.00	B320	Telephone conference with A. Chang, etc. re trust issues vis-à-vis bond holders in plan.
06/12/20	S. Maizel	0.60	480.00	B320	Telephone conference with Mintz Levin, M. Shinderman, etc. re plan issues.
06/12/20	S. Maizel	0.40	320.00	B320	Telephone conference with C. Montgomery, etc. re plan issues.
06/12/20	S. Maizel	0.50	400.00	B320	Telephone conference with R. Adcock, etc. re plan issues raised by UCC.
06/12/20	C. Montgomery	5.80	4,640.00	B320	Participate in phone conference with D Galfus, J Schlant, T Moyron, N Koffroth regarding liquidation analysis (.7); draft comments to liquidation analysis notes (.8); participate in conference call with A Chang, T Moyron, S Maizel regarding security interests in trust assets (.5); participate in conference call with M Shinderman, J Behrens, P Ricotta, D Bleck, T Moyron, S Maizel re plan proposals (.6); follow up conference calls with T Moyron, S Maizel and P Ricotta re committee proposals (.9); phone call with T Moyron and S Maizel re SV IPA administrative claim issue (.1); participate in conference call with B Bennett, J Reed, D Galfus, P Chadwick, N Coco. M Preusker, C Whitmore (.5); phone call from D Galfus re same (.1); review notes and participate in calls with T Moyron and S Maizel re same (.9); phone call with R Adcock, P Chadwick, D Galfus, T



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					Moyron, S Maizel regarding Committee demands (.5); communications with T Moyron regarding PBGC plan settlement (.2)
06/12/20	T. Moyron	6.20	3,715.35	B320	Conference call with A. Chang, et al. re POL matter (.5); conference call with Committee Counsel, Mintz, S. Maizel et al. re POL (.6); conference call with S. Maizel re POL (.4); conference call with lenders and C. Montgomery, et al. (.5); conference call with R. Adcock, P. Chadwick, C. Montgomery, et al. re Committee and POL (.5); exchange emails regarding PBGC (.2); conference call with R. Adcock and D. Galfus re PBGC (.2); conference call with BRG, et al. re best interest of creditors (1.1); analyze email from J. Schlant and updated test (.2); exchange emails with J. Schlant (.2); analyze motion and comments and prepare same (.6); exchange emails with lenders re call (.1); conference call with P. Ricotta and C. Montgomery re Committee and POL (.7); follow up call with P. Ricotta (.1); conference call with S. Maizel, et al. re Committee and POL (.3).
06/12/20	T. Moyron	0.40	239.70	B320	Analyze issues related to PBGC settlement (.2); exchange emails regarding same (.2).
06/13/20	J.A. Moe, II	0.40	239.70	B320	Complete review of the latest version of the revised Ballots, then E-Mail to David Hartie, Tania Moyron, Nick Koffroth and Sam Maizel transmitting the updated Ballots prepared as of the morning of June 12th, and explaining additional revisions still be inserted and reviewed following call with Mr. Hartie (.30); telephone call to David Hartie on scheduling call on June 14th to review six questions concerning the Ballots (.10).
06/13/20	S. Maizel	0.60	480.00	B320	Telephone conference with R. Adcock, etc. re PBGC issues vis-à-vis plan process.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/13/20	T. Moyron	4.50	2,696.63	B320	Conference call regarding PBGC settlement (.6); conference calls with N. Koffroth re plan documents (.1.4); analyze and prepare disclosure statement motion (1.6); analyze redlines and updated DS and plan (.6); analyze PBGC settlement terms (.3).
06/13/20	S. Alberts	0.60	480.00	B320	VHS Plan. Communicate with working group about PBGC settlement and plan support (.5) and follow up (.1).
06/13/20	N. Koffroth	5.40	2,708.10	B320	Draft amended plan (2.7), amended disclosure statement (1.3), draft motion to approve disclosure statement (1.4)
06/14/20	J.A. Moe, II	1.20	719.10	B320	Telephone call with David Hartie of KCC, reviewing answers to six questions on the Ballots, then review again and make additional modifications to the Ballots.
06/15/20	T. Moyron	1.40	838.95	B320	Analyze terms related to PBGC settlement (.2) and exchange emails regarding settlement (.2); prepare email to Mintz re UCC proposal (.1); prepare email to M. Shinderman re UCC proposal (.1); analyze 2005 proposal to UCC (.1); analyze stipulation and prepare comments to same (.1); exchange emails regarding same (.2); analyze ballot related correspondence and status from KCC and J. Moe (.3); correspond with board counsel re call (.1).
06/15/20	T. Moyron	0.70	419.48	B320	Analyze P. Saba, et al., emails re plan documents (.1); analyze matters with respect to updated plan and DS (.4); analyze updated timeline and relevant considerations (.2).
06/15/20	T. Moyron	0.90	539.33	B320	Conference call with C. Montgomery, et al. re timing re DS and POL.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	C. Montgomery	2.40	1,920.00	B320	Communications with T Moyron regarding plan filing extension and 2005 proposal (.1); communications with S Alberts and T Moyron re plan settlement (.8); begin review and comment upon same (.1); communications with T Moyron re plan settlement with Committee and 2005's (.2); participate in phone conference with T Moyron, S Maizel, and N Koffroth re plan confirmation timing (.8); follow up call with N Koffroth and T Moyron re same (.4)
06/15/20	T. Moyron	0.20	119.85	B320	Exchange emails with R. Adcock and P. Chadwick re 2005 proposal to UCC.
06/15/20	T. Moyron	0.40	239.70	B320	Conference call with M. Shinderman re POL (.2); prepare email with Mintz and Committee re timeline (.1); prepare email to R. Adcock, BRG, H. Levy-Biehl re Committee (.1).
06/15/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re plan issues.
06/15/20	S. Maizel	0.40	320.00	B320	Telephone conference with BRG, etc. re admin expense evaluation for plan.
06/15/20	G. Medina	0.60	175.95	B320	Review and file Second Stipulation Continuing Plan Milestone and lodge order (0.5); send efiled copies to N. Koffroth, S. Maizel and T. Moyron.
06/15/20	J.A. Moe, II	4.10	2,456.93	B320	Continue work on and review -- through three more iterations -- the Ballots, then transmit to Tania Moyron, Nick Koffroth, Sam Maizel and Dave Hartie (3.20); review and search Disclosure Statement for determination motions and Exhibit A, then revise one of two Class 4 Ballots (.50); review Nick Koffroth's E-Mail on new Plan provision, and incorporate into the Plan and transmit for review (.40).
06/15/20	S. Alberts	2.20	1,760.00	B320	VHS Plan. Review background and draft PBGC settlement (1.4); forward to working group (.1); follow up communications and reviews (.4); receive, review and comment on plan language (.3).
06/15/20	S. Maizel	0.80	640.00	B320	Telephone conference with T. Moyron re plan confirmation timeline.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	S. Maizel	0.10	80.00	B320	Review and respond to emails re UCC response to plan proposal.
06/15/20	N. Koffroth	7.10	3,560.65	B320	Draft joint plan of liquidation (3.7); draft disclosure statement describing joint plan of liquidation (2.6); draft motion to approve disclosure statement (0.8)
06/15/20	N. Koffroth	1.10	551.65	B320	Participate in conference calls concerning draft plan of liquidation with counsel to board (0.3); internal call re revisions to plan of liquidation (.8).
06/15/20	N. Koffroth	0.40	200.60	B320	Participate in call with P. Chadwick, D. Galfus, et al. re administrative claims on effective date
06/15/20	N. Koffroth	0.40	200.60	B320	Draft stipulation and order extending plan milestone
06/16/20	K.M. Howard	0.40	100.30	B320	Analysis of Stipulation to Extend Deadline for Debtors to file Plan and Disclosure and reviewed and revised Critical Dates Memorandum.
06/16/20	C. Montgomery	5.20	4,160.00	B320	Communications with T Moyron and M Shinderman regarding possible plan settlement (.1); communications regarding KCC ballots response time (.1); review Jones Day plan comments (.7); participate in KCC call regarding ballot timing (.3) ; participate In conference call Regarding Committee issues with Shinderman (.6); review Mintz additional Plan comments and communications with T Moyron regarding suggested plan and disclosure statement language edits (2.4) ; communications with T Moyron regarding Jones Day Comments and plan language changes (.5); phone calls with T Moyron re plan changes (.5)
06/16/20	S. Alberts	0.20	160.00	B320	VHS Plan. Send comments about retiree health.
06/16/20	M. Zeefe	4.80	2,305.20	B320	Call with N. Koffroth re notices of confirmation hearing (0.1); research same (0.6); call with L. Whidden re same (0.1); revise application for shortened notice on motion to approve disclosure statement (2.9); calls with T. Moyron re same (1.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	N. Koffroth	1.20	601.80	B320	Participate in conference calls with counsel to secured creditors re plan (0.6); KCC concerning solicitation procedures (0.6)
06/16/20	N. Koffroth	11.30	5,666.95	B320	Draft joint plan of liquidation (7.1); disclosure statement (1.2); motion to approve disclosure statement (2.0); application for order shortening notice (0.5); declaration of R. Adcock (0.3); proposed order shortening notice (0.2)
06/16/20	S. Maizel	0.40	320.00	B320	Drafting text for motion for expedited hearing on disclosure statement.
06/16/20	S. Schrag	0.10	33.60	B320	Confer with M. Zeefe regarding plan.
06/16/20	S. Maizel	0.30	240.00	B320	Telephone conference with R. Adcock, etc re plan issues.
06/16/20	S. Maizel	0.50	400.00	B320	Telephone conference with KCC re ballots, etc.
06/16/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re Jones Day comments on plan.
06/16/20	S. Maizel	0.40	320.00	B320	Telephone conference with T. Moyron re plan and disclosure statement filing issues.
06/16/20	T. Moyron	9.20	5,513.10	B320	Analyze comments from co-proponents to plan and DS and follow up comments (1.8); conference call with N. Koffroth re implementation of changes (.8); conference call with M. Zeefe re timeline and reasons for application and declaration (.5) and (.4); correspond with co-proponents re plan matters (.7); analyze updated disclosure statement motion (.6); conference call with P. Saba (.3); analyze and finalize updated DS and plan for filing (3.1); analyze correspondence from Mintz re calculations (.3); call with P. Ricotta and C. Montgomery re releases (.2); call with R. Adcock re status of DS, plan and motion and negotiations re same (.3); analyze emails from D. Galfus, et al. re application (.2).
06/16/20	J.A. Moe, II	0.20	119.85	B320	In regard to restructuring the Ballots for electronic balloting, review and identity three components of creation of the revised Ballots.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	J.A. Moe, II	0.30	179.78	B320	Telephone call to Andres Estrada, discussing creation of new electronic ballot for nine of ten classes of Claims (.10); preliminarily review Ballot with electronic instructions (.10); exchange E-Mails with Andres Estrada on revising the Ballots (.10).
06/16/20	J.A. Moe, II	1.00	599.25	B320	Review multiple E-Mails on filing of the Plan and Disclosure Statement, and proposed dates for the Plan, the Disclosure Statement and the Solicitation Package (.20); telephone calls to Andres Estrada's office on timing of solicitation and collecting votes (.10); exchange additional E-Mails on scheduling conference call (.10); telephone call with Andres Estrada on timing of the solicitation on the Plan (.10); conference telephone call both internally (Dentons) and externally (KCC) on Plan process and dates (.50).
06/16/20	J.A. Moe, II	0.20	119.85	B320	/Class 9 Claims/ Review former E-Mails on identification of Class 9 Claimants and the addresses, and confer with Andres Estrada on previous transmittal of the two Lists generated by Ted Hopper and Kathryn Howard.
06/16/20	C. Doherty, Jr.	0.20	74.80	B320	Prepare language for 9075 Application re Disclosure Statement.
06/17/20	N. Koffroth	0.60	300.90	B320	Draft notice re shortened notice hearing re disclosure statement motion
06/17/20	J.A. Moe, II	4.30	2,576.78	B320	In regard to the conference call on June 16th, review the Motion seeking approval of the Disclosure Statement, and review the form of Ballot received from KCC that permits electronic balloting, then create template for 9 of 11 Ballots, in preparation for telephone call with Andres Estrada (1.10); E-Mails to and telephone call from Andres Estrada on Ballot (.10); revise the Class 2 Ballot and the Class 4 Ballot, then transmit to Mr. Estrada, Dave Hartie, BRG personnel and internally for review (2.60); telephone call from Dave Hartie reviewing new Class 4 Ballot (.10); exchange E-Mails with (and telephone call to) Andres Estrada

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					on correction and addition (.10); make correction and insert addition into the Ballot (.20); telephone call with Andres Estrada on correction and addition (.10).
06/17/20	J.A. Moe, II	0.30	179.78	B320	Telephone conference with Elina Tilman and Karleen Murphy on repercussions of the Plan being approved and continued actions post petition.
06/17/20	K.M. Howard	0.40	100.30	B320	Analysis of Application Shortening time to set hearing and deadlines on shortened notice and reviewed and revised Critical Dates Memorandum accordingly.
06/17/20	K.M. Howard	0.40	100.30	B320	Analysis of the order approving second stipulation to continue plan milestone and reviewed and revised Critical Dates Memorandum
06/17/20	G. Medina	0.40	117.30	B320	Call and communication with N. Koffroth regarding filing (0.1); file and send e-copy of notice of hearing related to Motion for approval of chapter 11 disclosure statement Solicitation and Voting Procedures (0.3).
06/17/20	K.M. Howard	0.50	125.38	B320	Analysis of the Order on the Joint Motion regarding the Proposed Disclosure Statement, Solicitation and Voting Procedures, Notice and Objection Procedures for Amended Plan, Setting Administrative Claims Bar Date and reviewed and revised Critical Dates Memorandum accordingly.
06/17/20	K.M. Howard	0.30	75.23	B320	Analysis of Notice of Hearing of Joint Motion for Order Approving: 1) Disclosure Statement; 2) Voting Procedures; 3) Notice/Objection Procedures for Amended Plan; 4) Setting Administrative Claims Bar Date and reconciled same to Critical Dates Memorandum.
06/17/20	G. Miller	2.50	1,105.00	B320	Review Verity plan and disclosure statement (1.0); draft motion to approve disclosure statement (1.5).
06/17/20	T. Moyron	0.50	299.63	B320	Analyze PBGC settlement (.4); conference call with C. Doherty re comments (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	S. Alberts	0.40	320.00	B320	VHS Plan. Assist in PBGC settlement language (.2); raise retiree healthcare claim issue (.2).
06/17/20	T. Moyron	0.40	239.70	B320	Analyze order granting application re DS (.1); analyze and prepare related emails (.1); analyze and prepare notice (.2).
06/18/20	T. Moyron	0.40	239.70	B320	Analyze required documents and deadlines re POL (.3); analyze P. Ricotta email re POL documents (.1).
06/18/20	K.M. Howard	0.60	150.45	B320	Analysis of Motion for Approval of Plan and Disclosure Statement noting proposed pending dates.
06/18/20	C. Montgomery	0.10	80.00	B320	Communications with T Moyron, N Koffroth and P Ricotta re plan implementation timing issues.
06/18/20	J.A. Moe, II	0.20	119.85	B320	In regard to service of the Class 9 Ballots, confer with and exchange E-Mails with Kathryn Howard on second of two Lists on Insured Claims, review second List and E-Mail to Andres Estrada transmitting the second List of Insured Claims.
06/18/20	J.A. Moe, II	1.30	779.03	B320	In regard to the Ballots, review the Plan and the Motion, then make revisions to the Class 2 Ballot (.90); review the revised Ballot and internal discussion on revision (.10); review second version and transmit for review (.20); exchange E-Mails with Andres Estrada on the approval of the draft Ballots (.10).
06/18/20	J.A. Moe, II	0.40	239.70	B320	Confer with Andres Estrada on List of Insured Claimants, and review the Ted Hopper List (.10); review history of creating Lists on Insured Claims, and review List of Insured Claims prepared at Dentons (.30).
06/18/20	S. Maizel	0.40	320.00	B320	Telephone conference with James Behrens re DHCS negotiations (.3); email to him re same (.1).
06/19/20	C. Montgomery	0.10	80.00	B320	Communications with S Maizel and T Moyron regarding Mechanics Lien claim treatment.
06/19/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan of liquidation issues.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	J.A. Moe, II	0.30	179.78	B320	In regard to Ballots, review Class 4 Ballots for inclusion of dates, then commence work on revising 8 of 10 Ballots to conform to Class 2 Ballot (.20); review change to reference to instructions on 9 of 11 Ballots (.10).
06/19/20	J.A. Moe, II	0.10	59.93	B320	Confer with Karleen Murphy on revising the Chart in regard to the analysis of the employment law related matters and the Plan of Liquidation.
06/19/20	J.A. Moe, II	0.60	359.55	B320	In regard to Class 9 Ballots, review Andres Estrada's E-Mail on list of Claimants who are to be sent Ballots, and exchange E-Mails with Karen Chapman on addresses for two Claimants (.20); review Ted Hopper's Chart on insured claimants (.10); exchange additional E-Mails with Karen Chapman and E-Mails to Andres Estrada on Carlos Santos and Leilia Johnson (20); recall original Ted Hopper Chart and telephone call to Ms. Murphy on Ms. Johnson (.10).
06/20/20	J.A. Moe, II	0.20	119.85	B320	In regard to the Ballots to be distributed to the Class 9 Claimants, two telephone calls with Karleen Murphy on identifying information required to serve potential Claimant.
06/20/20	K. Murphy	0.30	124.95	B320	Telephone call with John Moe re assisting with preparation of list of claimants to receive Class Nine ballots (.1); and conduct search for claimant information on Hopper Chart (.2).
06/20/20	C. Montgomery	1.00	800.00	B320	Phone conference with TMoyron and P Saba regarding Nantworks and Integrity plan issues (.7); follow phone call are same with T Moyron (.3)
06/22/20	C. Montgomery	1.00	800.00	B320	Communications with T. Moyron and C. Whitmore regarding Plan (.2); communications with T. Moyron, N. Koffroth regarding plan release issue and review new decision re same (.8).
06/22/20	S. Maizel	0.20	160.00	B320	Telephone conference with Claude Montgomery re plan issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/22/20	N. Koffroth	2.40	1,203.60	B320	Draft plan of liquidation re releases and related review of recent Ninth Circuit case law
06/22/20	N. Koffroth	2.70	1,354.05	B320	Draft notice of confirmation hearing, notice of non-voting rejecting status, and notice of non-voting accepting status for supplement to motion to approve disclosure statement
06/22/20	J.A. Moe, II	0.10	59.93	B320	Telephone call with Kathryn Howard on Notice sent to Creditors and Parties-In-Interest on proposed actions in connection with the Disclosure Statement, and responding to inquiries.
06/23/20	T. Moyron	0.20	119.85	B320	Analyze PBGC comments and correspondence regarding same.
06/23/20	S. Maizel	0.40	320.00	B320	Telephone conference with T. Moyron re disclosure statement issues.
06/23/20	S. Maizel	0.70	560.00	B320	Telephone conference with T. Moyron, C. Montgomery, etc. re Integrity issues vis-à-vis plan process.
06/23/20	S. Maizel	0.30	240.00	B320	Telephone conference with UCC Counsel, etc. re plan issues.
06/23/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, BRG, etc. re foundation assets vis-à-vis plan process.
06/23/20	G. Medina	0.80	234.60	B320	Draft Chart of Disclosure statement objections filed and monitor docket.
06/23/20	S. Alberts	0.70	560.00	B320	VHS Plan. Communicate with T. Moyron regarding Plan issues (.4); receive and comment on PBGC comments to claim and Plan settlement (.2) and follow up (.1).
06/23/20	T. Moyron	3.60	2,157.30	B320	Conference call with D. Eldan re DOS (.1); coordinate stipulation to extend time and review D. Eldan, et al., emails (.1); call with P. Saba, et al., re document retention, carve out, etc. (.4); conference call with R. Adcock, P. Chadwick, et al. same (.6); call with M. Shiderman, et al. re Integrity requests (.3); conference call with R. Adcock, P. Chadwick, et al. re Seton Foundation (.3); prepare email to M. St. James re Seton Foundation (.1); analyze matters related to charitable funds (.4);

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					attend to issues related to DS objections (.2); analyze email from SGM counsel re deposit (.1); prepare emails re same (.1); conference call with J. Moe, et al. re claims, admin. expenses, etc. (.5); analyze matters related to claims and admin claims and excel (.4).
06/23/20	N. Koffroth	0.50	250.75	B320	Participate in call re plan issues with counsel to unsecured creditor
06/23/20	N. Koffroth	0.70	351.05	B320	Participate in call with R. Adcock, P. Chadwick, et al. re unsecured creditor proposed plan language
06/23/20	N. Koffroth	0.90	451.35	B320	Participate in internal call re claims and plan issues (0.5); participate in call with M. Shinderman, T. Moyron, et al. re plan issues (0.4)
06/23/20	N. Koffroth	0.30	150.45	B320	Participate in call with R. Adcock, H. Levy-Biehl re foundations
06/23/20	N. Koffroth	3.80	1,905.70	B320	Draft plan and disclosure statement
06/23/20	C. Montgomery	2.70	2,160.00	B320	Phone call with T Moyron regarding Integrity Plan issues (.3); participate in phone conference with R Adcock, P Chadwick, T Moyron regarding NantWorks plan issues (.6); communications with T Moyron regarding Foundation unrestricted asset issues (.3); participate in phone conference with M Shinderman, T Moyron and S Maizel regarding Integrity related plan issues (.4); participate in phone conference with R Adcock, P Chadwick regarding foundation plan issues (.3); review PBGC plan settlement and communications with T Moyron and S Alberts re same (.7); communications with H Levy-Biehl, T Moyron and S Maizel regarding foundation plan issues (.1)
06/24/20	K. Murphy	0.20	83.30	B320	Telephone call with John Moe re augmenting list of insured claims for Class 9 ballots.
06/24/20	G. Medina	0.50	146.63	B320	Review docket for any objections filed to the DS and send chart of objection filed to N. Koffroth for his consideration.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	N. Koffroth	0.30	150.45	B320	Participate in call with counsel to board re plan issues
06/24/20	J.A. Moe, II	0.30	179.78	B320	In regard to the Ballots, confer with Karleen Murphy on creating augmented List of Insured Claimants for the Class 9 Ballots, preliminarily reviewing names.
06/24/20	C. Doherty, Jr.	0.20	74.80	B320	
06/24/20	N. Koffroth	2.00	1,003.00	B320	Participate in internal call with C. Montgomery, T. Moyron, et al. re plan issues
06/24/20	N. Koffroth	6.30	3,159.45	B320	Draft plan and disclosure statement (4.8) ; draft reply in support of motion to approve disclosure statement (1.5)
06/24/20	T. Moyron	0.50	299.63	B320	Analyze M. St. James email (.1); analyze AG letter (.2); prepare correspondence to H. Levy-Biehl re same (.2).
06/24/20	T. Moyron	0.80	479.40	B320	Conference call with R. Adcock, P. Chadwick, H. Levy-Biehl, et al. re plan and sales and status of other matters.
06/24/20	T. Moyron	1.10	659.18	B320	Analyze email from P. Saba re plan comments (.1); analyze JD comments (.6); prepare correspondence regarding document retention orders and related matters (.2) and analyze responses (.2).
06/24/20	T. Moyron	0.30	179.78	B320	Conference call with Board's counsel re plan (.2); analyze follow up email (.1).
06/24/20	C. Montgomery	2.50	2,000.00	B320	Review Jones Day Comments on Plan (.4); participate in phone conference with S Maizel, T Moyron, N Koffroth regarding same (1.9); communications with C Doherty regarding plan connection to 1114 benefits (.1); communications with R Richards regarding document retention issues (.1)
06/24/20	K.M. Howard	0.40	100.30	B320	Analysis of Order Approving Stipulation between Debtors and Nantworks to extend objection deadlines to Debtors' Motion to Approve Disclosure Statement and reviewed and revised Critical Dates Memorandum.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	T. Moyron	1.60	958.80	B320	Conference call Dentons internal re JD Comments and plan.
06/24/20	R. Richards	1.50	1,084.50	B320	Review Jones Day proposed language re document preservation (0.2); review key portions of existing document retention policies motions and orders (1.1); emails re same (0.2).
06/24/20	S. Maizel	0.30	240.00	B320	Telephone conference with Board counsel re releases in plan.
06/24/20	S. Maizel	2.00	1,600.00	B320	Telephone conference with T. Moyron, C. Montgomery, etc. re Jones Day comments on plan.
06/24/20	S. Alberts	0.20	160.00	B320	VHS Plan. Communication about PBGC claim resolution.
06/24/20	K.M. Howard	0.40	100.30	B320	Analysis of order approving stipulation continuing attorney general's objection deadlines to Debtors' Motion to Approve Disclosure Statement and reviewed and revised Critical Dates Memorandum.
06/25/20	N. Koffroth	2.80	1,404.20	B320	Participate in internal call re plan of liquidation (0.4); participate in call re plan comments with P. Chadwick, J. Schlant, et al. (0.5); participate in internal call re responses to objections to disclosure statement (1.9)
06/25/20	N. Koffroth	0.80	401.20	B320	Draft stipulation and order resolving Attorney General disclosure statement objection
06/25/20	N. Koffroth	4.50	2,256.75	B320	Draft plan and disclosure statement
06/25/20	C. Doherty, Jr.	0.80	299.20	B320	Prepare research memo regarding confirmation factors.
06/25/20	G. Medina	0.90	263.93	B320	Review and retrieve all objections to the disclosure statement (0.5); update objection charts and send to T.Moyron, S. Maizel , C. Montgomery and N. Koffroth (0.4).
06/25/20	T. Moyron	4.90	2,936.33	B320	Analyze and prepare language for the DS order in connection with AG request (.3); correspond regarding same with N. Koffroth (.2); correspond with D. Eldan, Committee counsel re same (.2); analyze and prepare comments to proposed language re JD documents (.6); conference call with P.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					Saba re same (.3); conference call with S. Alberts, et al. re PBGC (.3); prepare email to PBGC (.1); Conference call with S. Maizel, et al. re objections to DS and responses thereto (1.9); analyze proposed language re SGM re DS (.2); correspond with Mintz and Milbank re same (.3); analyze emails from Mintz and Milbank and respond to same re revised language in Plan re JD comments (.2); analyze list of objections and objections (.3).
06/25/20	S. Alberts	0.70	560.00	B320	VHS Plan. Review background (.1); communicate with working group regarding PBGC settlement (.3); emails about retiree health claims and plan (.3).
06/25/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, etc. re PBGC issues vis-à-vis plan.
06/25/20	S. Maizel	0.50	400.00	B320	Telephone conference with plan comments from Jones Day, etc.
06/25/20	C. Montgomery	3.10	2,480.00	B320	Participate in conference call with T Moyron, S Alberts, S Maizel, N Koffroth regarding PBGC settlement (.4); participate in plan conference call with P Chadwick, S Maizel, T Moyron, R Richards regarding Jones Day plan issues (.5); communications with T Moyron and S Maizel regarding changes to Plan section 5.9 (.7); communications regarding confidentiality agreements and plan discussions (.2); participate in conference call regarding Disclosure Objections with T Moyron, S Maizel and N Koffroth (1.3)
06/25/20	R. Richards	0.90	650.70	B320	Prepare for call with Jones Day re same (.4); call with Jones Day re provision (.3); prepare alternative language for Section 5.9 of the Plan (.2).
06/25/20	S. Maizel	2.00	1,600.00	B320	Telephone conference with C. Montgomery, etc. re disclosure statement revisions and issues.
06/25/20	S. Maizel	0.30	240.00	B320	Review and respond to emails re revisions to plan.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	T. Moyron	1.20	719.10	B320	Analyze email from G. Klausner re SGM language (.1); prepare response to G. Klausner (.1); analyze redline of proposed language and prepare same (.3); conference call with C. Montgomery re SGM (.5); analyze M. Shinderman, et al., emails (.2).
06/26/20	T. Moyron	0.90	539.33	B320	Conference call with P. Saba re objection and related issues as settlement discussion (.1); conference call with P. Saba, R. Adcock, and D. Sachs re same (.4); prepare emails to M. Shinderman, P. Ricotta, et al. re same (.1); prepare emails to R. Adcock, et al. (.1) and call re same (.1); analyze responses from M. Shinderman (.1).
06/26/20	K.M. Howard	0.40	100.30	B320	Analysis of order approving second stipulation continuing Nantworks' objection deadlines to approve the Disclosure Statement and reviewed and revised Critical Dates Memorandum.
06/26/20	K.M. Howard	0.20	50.15	B320	Analysis of Stipulation and Order approving AG language to be incorporated into the Disclosure Statement to determine any applicable deadlines.
06/26/20	S. Alberts	0.50	400.00	B320	VHS Plan. Review and comment on PBGC settlement Motion (.4) and follow up (.1).
06/26/20	N. Koffroth	7.80	3,911.70	B320	Draft omnibus reply in support of motion to approve disclosure statement
06/26/20	C. Montgomery	1.00	800.00	B320	Communications with T. Moyron regarding disclosure statement (.1); communications with T. Moyron, M. Shinderman, regarding NantWorks Disclosure objections (.2); communications with G. Klausner and T. Moryron regarding SGM disclosure objections(.1);communications with J Moe and T Moyron regarding RPHW objection to Disclosure Statement (.1); phone call with T. Moyron re SGM langauge problem (.5)
06/26/20	N. Koffroth	0.40	200.60	B320	Participate in call with counsel to board re plan issues

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/27/20	C. Montgomery	1.40	1,120.00	B320	Participate in confrence call with S. Maizel and T. Moyron regarding Jones Day objections and Committee role (.4); participate in conference call with D. Galfus, S. Maizel, T. Moyron regarding priority claims and claim objections for confirmation an related issues (1.0)
06/27/20	T. Moyron	3.90	2,337.08	B320	Analyze and prepare omnibus reply and analyze related matters thereto (2.4); conference call with D. Galfus re SGM (.1); analyze email from SGM counsel and attached word document re DS (.2); analyze M. Shinderman email re JD re Integrity (.1); conference call with BRG, et al. re priority claims and related plan matters (.8); exchange emails with M. Shinderman re SGM (.1); analyze FRAP re stay (.2).
06/27/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re plan issues.
06/27/20	S. Maizel	0.90	720.00	B320	Telephone conference with BRG, etc. re priority claims and the plan process.
06/27/20	N. Koffroth	1.90	952.85	B320	Draft omnibus reply in support of disclosure statement motion
06/28/20	S. Maizel	0.30	240.00	B320	Telephone conference with client, etc. re disclosure statement issues.
06/28/20	S. Maizel	0.30	240.00	B320	Drafting insert for omnibus reply to objections from DHCS.
06/28/20	C. Montgomery	2.60	2,080.00	B320	Communications with T. Moyron, S. Martin, M. Shinderman, P. Ricotta regarding SGM disclosure statement language (.9); review draft response to Disclosure statement objections (1.1); phone call with D. Galfus, S. Martin, S. Maizel regarding SGM deposit (.3); phone call T. Moyron regarding Liquidating Trust Asset role in SGM langague (.2); communications with M. Shinderman, P. Ricotta and T. Moyron re disclosure statement issues (.1)
06/28/20	J.A. Moe, II	0.10	59.93	B320	Telephone call to Karleen Murphy on service of Class 9 Ballots.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/28/20	T. Moyron	1.40	838.95	B320	Conference call with D. Galfus, S. Martin, et al. re SGM deposit (.3); exchange emails with P. Ricotta, et al. re SGM deposit language (.3); prepare document re additional language (.2); analyze comments on reply (.1); conference call with N. Koffroth re plan matters (.5).
06/29/20	K.M. Howard	0.20	50.15	B320	Telephone conference with Adrian Jimenez regarding the notice and Ballots (.1); email exchange with S. Maizel regarding same (.1).
06/29/20	J.A. Moe, II	0.20	119.85	B320	Review the Debtors' Response to the Objections to the proposed Plan, including Objections filed by Cigna, DHSC, HHS and Seton Medical Staff, and comments by the Attorney General.
06/29/20	J.A. Moe, II	0.20	119.85	B320	In regard to the Ballots on Class 9, review Andres Estrada's E-Mail, conferring with Mr. Estrada on Carlos Santos and Lielia Johnson.
06/29/20	T. Moyron	1.90	1,138.58	B320	Analyze email from SGM and proposed additional language re DS (.1); correspond with M. Shinderman, et al. re DS (.2); conference call with P. Ricotta DS related matters including Committee email (.1); conference call with P. Ricotta re SGM requested additional language (.3); analyze email from P. Ricotta re same (.1); analyze and finalize omnibus reply (.6); conference call with M. Shinderman, et al. re Integrity (.3); exchange emails with M. Shinderman re motion and determination motion (.2).
06/29/20	S. Alberts	0.20	160.00	B320	VHS Plan. Communicate about terminating DC plans.
06/29/20	T. Moyron	0.20	119.85	B320	Analyze PBGC emails and reply to same re settlement agreement and motion.
06/29/20	T. Moyron	0.20	119.85	B320	Coordinate matters related to LT.
06/29/20	T. Moyron	0.10	59.93	B320	Analyze email from SEC and reply to same re call.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	C. Montgomery	0.90	720.00	B320	Communications with T. Moyron and M. Shinderman regarding disclosure statement responses (.2); review SEC Plan comments (.2); participate in phone calls with T. Moyron, S. Maizel and M. Shinderman regarding Integrity issues (.4); follow up call with T. Moyron re same (.1)
06/29/20	S. Maizel	0.70	560.00	B320	Telephone conference with Mintz Levin, etc. re plan issues (.4); telephone conference with M. Shinderman re same (3).
06/29/20	N. Koffroth	4.20	2,106.30	B320	Draft omnibus reply in support of disclosure statement motion
06/30/20	N. Koffroth	2.80	1,404.20	B320	Draft order approving disclosure statement motion
06/30/20	N. Koffroth	0.50	250.75	B320	Participate in internal call concernig disclosure statement and plan amendments
06/30/20	S. Maizel	0.50	400.00	B320	Review and respond to emails from K. Wang re disclosure statement issues.
06/30/20	N. Koffroth	0.50	250.75	B320	Participate in call with counsel to SEC re plan
06/30/20	T. Moyron	0.50	299.63	B320	Conference call with N. Koffroth regarding open matters related to Disclosure Statement and necessary updates for filing.
06/30/20	K.M. Howard	1.10	275.83	B320	Email exchanges regarding the upcoming hearing on approval of the Disclosure Statement (.1); reviewed and assembled applicable pleadings to Debtors' Disclosure Statement (.9); prepared email to Verity Team regarding same (.1).
06/30/20	T. Moyron	0.70	419.48	B320	Call with SEC re releases (.5); exchange emails with Committee counsel re objections (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	K. Murphy	2.40	999.60	B320	Prepare initial draft of chart of Updated List for Class 9 Ballots by analyzing list of new medical malpractice claims and employment claims since November 2019 (1.0); telephone call with John Moe to discuss and prepare edits to initial draft (1.2); telephone call with John Moe and Elina Tilman re the same (.1); and draft email to Andres Estrada inquiring whether certain individuals filed proofs of claims (.1).
06/30/20	J.A. Moe, II	0.30	179.78	B320	In regard to the review of Claim 9 Insured Claims, telephone call to Karleen Murphy on completing List of additional Claims (.20); second call with Mr. Murphy on list of claims (.10);
06/30/20	J.A. Moe, II	1.20	719.10	B320	In regard to service of Class 9 Ballots, review with Karleen Murphy the newly created List on additional Claims, whether insured, date of incident and whether Proof Of Claim is filed, identifying additional parties who should be served with a Class 9 Ballot (1.00); telephone calls with Ms. Murphy and Elina Tilman on Mike Fayfel's claims (.10); exchange multiple E-Mails with Elina Tilman and Andres Estrada on claim of Dwight Rapp, and telephone call with Karleen Murphy on amount of SIR on Rapp and whether Fayfel is a covered claim (.10).
06/30/20	J.A. Moe, II	0.40	239.70	B320	Review request from Tania Moyron, and commence search to identify Disclosure Statement Order in Gardens Regional Case, then identify and transmit the Order to Tania Moyron.
06/30/20	J.A. Moe, II	0.40	239.70	B320	Review Andres Estrada's's Memorandum on distribution of Plan documents, and inquiries on Eutrice Graham's address (.10); review E-Mails on distribution of the Ballots insured claimant to Andres Estrada (.10); review Docket and identify documents on four Motions For Relief From Stay (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	T. Moyron	1.00	599.25	B320	Correspond with Committee Counsel re DS (.1); correspond with KCC re DS (.1); analyze internal responses regarding KCC inquiries (.1); analyze G. Klausner, et al., emails re Deposit (.2); analyze Prime requested language (.1); correspond with Committee counsel and respond to same re Prime (.1); prepare email to Prime's counsel re Plan (.1); analyze matters related to DS order (.2).
06/30/20	T. Moyron	0.10	59.93	B320	Analyze email from K. Wang re objections to disclosure statement (.1); analyze proposed response and reply to same (.1).
06/30/20	T. Moyron	0.50	299.63	B320	Conference call with N. Koffroth regarding comments to DS Order.
06/30/20	C. Montgomery	1.80	1,440.00	B320	Communications with T Moyron regarding ballots and review of solicitation summary (1.2); participate in conference call with SEC regarding released parties (.4); follow up with T Moyron (.2)
<b>Subtotal</b>		<b>393.30</b>	<b>233,234.54</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	N. Koffroth	0.40	200.60	EMP	Participate in weekly labor issues call with R. Adcock, S. Alberts, et al.
06/02/20	S. Alberts	0.80	640.00	EMP	VHS Labor. Weekly labor call (.4); follow up with D. Galfus concerning labor and pension issues (.4).
06/02/20	A. Shiran	0.40	205.80	EMP	Attend team labor call.
06/02/20	S. McCandless	0.40	319.60	EMP	Attend team labor and employment conference call.
06/08/20	A. Shiran	0.30	154.35	EMP	
06/08/20	S. McCandless	0.30	239.70	EMP	Attend labor and bankruptcy team coordinating conference call.
06/09/20	A. Shiran	0.40	205.80	EMP	
06/09/20	N. Koffroth	0.10	50.15	EMP	Participate in weekly labor issues call with R. Adcock, P. Chadwick, et al.
06/10/20	A. Shiran	2.10	1,080.45	EMP	
06/10/20	S. McCandless	1.90	1,518.10	EMP	
06/15/20	S. McCandless	0.40	319.60	EMP	
06/15/20	S. Maizel	0.50	400.00	EMP	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	A. Shiran	0.50	257.25	EMP	[REDACTED]
06/16/20	A. Shiran	1.10	565.95	EMP	Team labor call (.5) [REDACTED] review mediation information from mediator (.2)
06/16/20	S. McCandless	0.90	719.10	EMP	Attend team labor call ([REDACTED]) [REDACTED]
06/16/20	N. Koffroth	0.50	250.75	EMP	Participate in weekly call with R. Adcock, A. Ruda, et al. re labor issues
06/23/20	N. Koffroth	0.60	300.90	EMP	Participate in weekly call re labor issues with R. Adcock, A. Ruda, et al.
06/23/20	S. McCandless	0.60	479.40	EMP	Participate in labor team conference call.
06/23/20	A. Shiran	0.60	308.70	EMP	Attend Labor call.
06/29/20	A. Shiran	4.80	2,469.60	EMP	[REDACTED]
06/30/20	A. Shiran	0.60	308.70	EMP	Labor call.
06/30/20	S. Alberts	0.50	400.00	EMP	VHS Labor. General labor call.
06/30/20	S. McCandless	0.60	479.40	EMP	Team labor update call (with R. Adcock).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	N. Koffroth	0.60	300.90	EMP	Participate in weekly call with R. Adcock, A. Ruda, et al. re labor issues
	<b>Subtotal</b>	<b>19.90</b>	<b>12,174.80</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	T. Moyron	0.20	119.85	INS	Analyze and respond to T. Conner, et al. emails re tail.
06/11/20	S. Maizel	0.30	240.00	INS	Telephone conference with R. Adcock, etc. re insurance issues.
06/17/20	T. Moyron	0.90	539.33	INS	Conference call with Lockton, T. Conner and K. Chapman re status and insurance matters (.5); analyze email and attachment from P. Opp (.1); prepare emails to C. Montgomery, et al., re VHS timing and board (.2); analyze emails from Ropes & Gray and response thereto re D&O (.1).
06/17/20	C. Montgomery	0.70	560.00	INS	Communications with T Moyron regarding insurance continuation issues arising under the Plan.
06/18/20	C. Montgomery	1.90	1,520.00	INS	Continued review of insurance continuation issues for directors.
06/18/20	C. Montgomery	1.00	800.00	INS	Additional review of Prime APA provisions re indemnification.
06/19/20	T. Moyron	0.20	119.85	INS	Analyze K. Chapman emails, et al. re insured claims.
06/22/20	C. Montgomery	0.50	400.00	INS	Begin drafting note to T Moyron regarding insurance continuation issues.
06/23/20	C. Montgomery	1.60	1,280.00	INS	Continue drafting note to T Moyron regarding insurance duration.
06/24/20	C. Montgomery	1.90	1,520.00	INS	Continue drafting of note regarding insurance continuation.
06/25/20	C. Montgomery	3.00	2,400.00	INS	Continued drafting of insurance analysis.
06/25/20	T. Moyron	0.60	359.55	INS	Conference call with Lockton, R. Adcock, et al. re tail (.4); and review documents to be updated (.2).
06/27/20	C. Montgomery	1.70	1,360.00	INS	Continue drating insurance continuation note.
<b>Subtotal</b>		<b>14.50</b>	<b>11,218.58</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/08/20	N. Koffroth	0.50	250.75	MED/CMS	Participate in call with counsel to HHS concerning transfer of Medicare provider agreements
06/17/20	G. Medina	0.50	146.63	MED/CMS	Communication with N. Koffroth regarding filing stipulation (0.1); review, file and upload HSS Stipulation re Transfer of Provider Agreements (0.3); download and send e-filed copy to N. Koffroth, T. Moyron and S. Maizel (0.1).
<b>Subtotal</b>		<b>1.00</b>	<b>397.38</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/07/20	S. Maizel	0.50	400.00	MED/DHCS	Revising motion re DHCS offset.
06/16/20	S. Maizel	0.40	320.00	MED/DHCS	Review and respond to emails with Ken Wang re Medi-Cal provider agreement issue.
06/19/20	N. Koffroth	0.40	200.60	MED/DHCS	Draft stipulation re DHCS objections to transfer of provider agreements
06/29/20	T. Moyron	0.50	299.63	MED/DHCS	Analyze H. Levy-Biehl, emails re Medi-Cal settlement (.2); analyze S. Maizel emails re settlement (.2); analyze K. Wang notice (.1).
<b>Subtotal</b>		<b>1.80</b>	<b>1,220.23</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**REP - Reporting**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	K.M. Howard	0.10	25.08	REP	Email exchange with N. Haslun regarding Debtors' April Monthly Operating Report.
	<b>Subtotal</b>	<b>0.10</b>	<b>25.08</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2303156

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	15,316.58
B110	Case Administration	11,067.70
B130	Asset Disposition	3,649.93
B140	Relief from Stay/Adequate Protection Proceedings	75.23
B150	Meetings of and Communications with Creditors	3,844.91
B160	Fee/Employment Applications	17,928.11
	Less Discount to Client	(9,314.00)
B180	Avoidance Action Analysis	320.00
B185	Assumption/Rejection of Leases and Contracts	1,369.79
B190	Other Contested Matters (excl. assumption/rejection motions)	2,899.66
B200	Operations	2,303.71
B220	Employee Benefits/Pension	448.80
B230	Financing/Cash Collections	1,595.18
B240	Tax Issues	59.93
B250	Real Estate	312.50
B260	Board of Directors Matters	320.00
B300	Claims and Plan	21,545.73
B310	Claims Administration and Objections	10,468.01
B320	Plan and Disclosure Statement (incl. Business Plan)	233,234.54
EMP	Employee matters	12,174.80
INS	Insurance	11,218.58
MED/CMS	Medicare/CMS Issues	397.38
MED/DHCS	Medi-Cal/DHCS Issues	1,220.23
REP	Reporting	25.08
Total This Matter		\$342,482.38

Verity Health System of California, Inc.  
Invoice #: 2303156

July 29, 2020

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
B. Greer	\$800.00	4.20	\$3,360.00
C. Montgomery	\$800.00	74.50	\$59,600.00
S. Alberts	\$800.00	13.50	\$10,800.00
S. Maizel	\$800.00	43.40	\$34,720.00
A. Sharetta	\$800.00	8.70	\$6,960.00
A.C. Chang	\$625.00	0.50	\$312.50
R. Richards	\$723.00	5.30	\$3,831.90
S. McCandless	\$799.00	5.50	\$4,394.50
T. Moyron	\$599.25	93.50	\$56,030.08
J.A. Moe, II	\$599.25	75.70	\$45,363.54
K. Murphy	\$416.50	22.00	\$9,163.00
A. Ruegger	\$800.00	2.90	\$2,320.00
M.A. Isaacs	\$531.25	0.90	\$478.13
M. Zeefe	\$480.25	45.00	\$21,611.31
A. Shiran	\$514.50	12.70	\$6,534.15
C. Doherty, Jr.	\$374.00	4.30	\$1,608.20
G. Miller	\$442.00	2.50	\$1,105.00
L. Macksoud	\$437.75	4.90	\$2,145.00
N. Koffroth	\$501.50	136.90	\$68,655.35
S. Schrag	\$336.00	0.10	\$33.60
D. Pina	\$318.75	3.50	\$1,115.63
G. Medina	\$293.25	9.40	\$2,756.58
K.M. Howard	\$250.75	30.40	\$7,622.91
M. Sanchez	\$255.00	<u>5.00</u>	<u>\$1,275.00</u>
Totals		605.30	\$351,796.38

Verity Health System of California, Inc.  
Invoice #: 2303156

July 29, 2020

Fee Total	\$ 342,482.38
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Invoice Total	<u>\$ 342,482.38</u>
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The logo for Dentons, featuring the word "DENTONS" in white capital letters on a purple rectangular background.

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303139**

Client/Matter: 15800425-000003

Verity Health System of California

Payment Due Upon Receipt

Total This Invoice	\$	25,642.81
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S. Maizel  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303139**

Client/Matter: 15800425-000003

Verity Health System of California

### DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/5/2020	FedEx Airbill #393572199463 06/05/20 Delivery to 13819 Burbank Boulevard, U VAN NUYS, CA	32.52
6/10/2020	Delivery & Postage ACE ATTORNEY, INVOICE 327641 6/11/20 DELIVERY REG. TO, SUSAN MITCHELL 1858470PRINTOUTS - PLS EMAIL POD TO SUSAN.MITCH	34.10
6/16/2020	Delivery & Postage FedEx Airbill #393928449884 06/16/20 Delivery to 1701 LA BARRANCA RD, LA CANADA FLINTRID, CA	15.34
6/12/2020	Delivery & Postage FedEx Airbill #393811692127 06/12/20 Delivery to 1701 LA BARRANCA RD, LA CANADA FLINTRID, CA	32.83
6/19/2020	Delivery & Postage FedEx Airbill #394029437293 06/19/20 Delivery to 13819 Burbank Boulevard, U VAN NUYS, CA	56.02
6/24/2020	Delivery & Postage FedEx Airbill #394194999947 06/24/20 Delivery to 1701 LA BARRANCA RD, LA CANADA FLINTRID, CA	16.50
6/29/2020	Delivery & Postage FedEx Airbill #394335358650 06/29/20 Delivery to 13819 Burbank Boulevard, U VAN NUYS, CA	16.26
6/29/2020	Delivery & Postage FedEx Airbill #394335007043 06/29/20 Delivery to 1701 LA BARRANCA RD, LA CANADA FLINTRID, CA	16.26
6/24/2020	Delivery & Postage FedEx Airbill #394195261528 06/24/20 Delivery to 505 N LAKE SHORE DR APT 27 CHICAGO, IL Mediation Documents	40.56
	<b>SUBTOTAL</b>	<b>260.39</b>
6/23/2020	Filing Fees Karleen F. Murphy, CourtCall Verity - Leonard Harris v. SFMC re Status Conference	94.00
6/9/2020	Filing Fees Karleen F. Murphy, CourtCall Verity - Reyes- Hernandez v. Seton Medical Center	94.00
6/3/2020	Filing Fees ACE ATTORNEY, INVOICE 327641 6/03/20 EFILING PRIORITY TO, SANTA CLARA COUNTY SUPERIOR CO1856776CASE STATUS REVIEW	68.05



Verity Health System of California

July 29, 2020

Matter: 15800425-000003

Invoice No.: 2303139

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/3/2020	Filing Fees ACE ATTORNEY, INVOICE 327641 6/03/20 PDF CHAMBERS COPY NEXTDAY TO, SANTA CLARA SUPERIOR COURT 1856777CASE STATUS REVIEW	111.35
6/8/2020	Filing Fees ACE ATTORNEY, INVOICE 327641 6/08/20 PDF FILING SD TO, COMPTON SUPERIOR COURT 1857522STATEMENT	81.45
6/18/2020	Filing Fees	16.40
6/1/2020	Filing Fees Tania M. Moyron, Attendance by Tania Moyron at May 27, 2020 hearing by CourtCall.	43.05
6/1/2020	Filing Fees Tania M. Moyron, Attendance by Peter Chadwick at May 27, 2020 hearing by CourtCall.	37.45
6/1/2020	Filing Fees Tania M. Moyron, Attendance by Hope Levy-Biehl at May 27, 2020 hearing by CourtCall.	43.05
6/1/2020	Filing Fees Nicholas Koffroth, Attendance by Nick Koffroth at May 27, 2020 hearing by CourtCall.	43.05
6/17/2020	Filing Fees Tania M. Moyron, Appearance of S. Alberts by CourtCall at June 10, 2020 hearing.	43.05
6/17/2020	Filing Fees Tania M. Moyron, Appearance of A. Ruda by CourtCall at June 10, 2020 hearing.	43.05
6/17/2020	Filing Fees Tania M. Moyron, Appearance of H. Levy-Biehl by CourtCall at June 10, 2020 hearing.	37.45
6/17/2020	Filing Fees Tania M. Moyron, Appearance of T. Moyron by CourtCall at June 10, 2020 hearing.	43.05
6/17/2020	Filing Fees Tania M. Moyron, Appearance of P. Chadwick by CourtCall at June 10, 2020 hearing.	37.45
6/17/2020	Filing Fees Tania M. Moyron, Appearance of C. Doherty by CourtCall at June 10, 2020 hearing.	43.05
6/17/2020	Filing Fees John A. Moe, II, Telephonic attendance at hearing re Chow v. Leyba, et al.	94.00
6/17/2020	Filing Fees Nicholas Koffroth, Appearance by N. Koffroth at June 10, 2020 hearing.	43.05
6/17/2020	Filing Fees Samuel R. Maizel, CourtCall fee re June 10 telephonic conference.	37.45
6/23/2020	Filing Fees Samuel R. Maizel, Ben Hyatt invoice 1156559 re transcript of 6/10 hearing.	31.82
6/1/2020	Filing Fees Samuel R. Maizel, Courtcall fees re 5/27/20 telephonic hearing.	43.05
SUBTOTAL		1,128.32

Verity Health System of California

July 29, 2020

Matter: 15800425-000003

Invoice No.: 2303139

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/23/2020	Lexis SHIRAN\ ANNA	26.50
6/23/2020	Lexis SHIRAN\ ANNA	49.50
6/11/2020	Lexis MURPHY\ KARLEEN	27.25
6/11/2020	Lexis MURPHY\ KARLEEN	101.83
6/11/2020	Lexis MURPHY\ KARLEEN	1,690.02
6/17/2020	Lexis HSU\ ISABELLA	79.50
6/17/2020	Lexis HSU\ ISABELLA	346.50
	SUBTOTAL	2,321.10
6/18/2020	Outside Professional Services JAMS deposit for services re Mediation.	11,250.00
	SUBTOTAL	11,250.00
6/4/2020	WESTLAW DOHERTY\CASEY	225.00
6/4/2020	WESTLAW GREER\BRIAN	300.00
6/8/2020	WESTLAW KOFFROTH\NICHOLAS	216.00
6/10/2020	WESTLAW KOFFROTH\NICHOLAS	108.00
6/11/2020	WESTLAW DOHERTY\CASEY	75.00
6/16/2020	WESTLAW DOHERTY\CASEY	75.00
6/17/2020	WESTLAW DOHERTY\CASEY	150.00
6/18/2020	WESTLAW DOHERTY\CASEY	75.00
6/19/2020	WESTLAW DOHERTY\CASEY	75.00
6/12/2020	WESTLAW HSU\ISABELLA	943.00
6/14/2020	WESTLAW HSU\ISABELLA	868.00
6/15/2020	WESTLAW HSU\ISABELLA	1,941.00
6/17/2020	WESTLAW HSU\ISABELLA	2,664.00
6/18/2020	WESTLAW HSU\ISABELLA	319.00
6/20/2020	WESTLAW HSU\ISABELLA	197.00
6/22/2020	WESTLAW DOHERTY\CASEY	375.00
6/23/2020	WESTLAW DOHERTY\CASEY	75.00
6/24/2020	WESTLAW DOHERTY\CASEY	450.00
6/25/2020	WESTLAW DOHERTY\CASEY	150.00

July 29, 2020

Invoice No.: 2303139

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/26/2020	WESTLAW DOHERTY\CASEY	150.00
6/27/2020	WESTLAW KOFFROTH\NICHOLAS	427.00
6/27/2020	WESTLAW DOHERTY\CASEY	600.00
6/28/2020	WESTLAW DOHERTY\CASEY	225.00
	SUBTOTAL	10,683.00
	Total Disbursements	\$25,642.81
	Disbursement Total	\$ 25,642.81
	Invoice Total	<u>\$ 25,642.81</u>

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303158**

Matter: 15800425-000004  
O'Connor Hospital

Payment Due Upon Receipt

Total This Invoice

\$ 1,573.81

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SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

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In the case of overnight deliveries to:

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233 South Wacker Drive  
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227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303158**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000004  
O'Connor Hospital

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	R. Garms	0.40	241.40	B130	Review purchase agreement regarding client question (0.3); e-mails regarding same (0.1).
	<b>Subtotal</b>	<b>0.40</b>	<b>241.40</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2303158

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	J.A. Moe, II	0.10	59.93	B190	/Lisa Swain v. O'Connor/ Review and approve Case Management Conference Statement, and E-Mail to Karleen Murphy.
06/02/20	K. Murphy	0.10	41.65	B190	/ Swain / Confer with John Moe re approval to file draft of Status Conference Statement re Bankruptcy and draft email to Laurie Soledad re the same.
06/03/20	K. Murphy	0.10	41.65	B190	/ Thomson/ Analyze and respond to email from John Moe re letter to plaintiff's counsel on notice of bankruptcy and automatic stay.
06/03/20	K. Murphy	0.10	41.65	B190	/ Thomson/ Analyze email from Elizabeth Ferguson re status of stipulation to continue status conference and post mediation status conference.
06/03/20	J.A. Moe, II	0.10	59.93	B190	/Lisa Swain v. O'Connor/ Review proposed Case Management Conference Statement and E-Mail to Karleen Murphy on reviewing E-Mail from Elizabeth Ferguson on continuance of the current hearing.
06/03/20	J.A. Moe, II	0.10	59.93	B190	/Sydney Thomson v. O'Connor/ Review Karleen Murphy's E-Mail and review letter to Lori Costanzo, and question as to Notice Of Stay filed; telephone call to Karleen Murphy; review Elizabeth Ferguson's E-Mail on Stipulation on continuing the hearing.
06/04/20	K.M. Howard	0.40	100.30	B190	Analysis of Request to Continue Case Management Conference in Swain v. O'Connor Hospital and reviewed and revised Litigation Management Chart accordingly.
06/17/20	J.A. Moe, II	0.20	119.85	B190	/Denise Greenwood v. O'Connor/ Telephone call with Elina Tilman on whether there is relief from stay and insurance coverage, reviewing Court Docket to insure no Motion has been filed.
06/23/20	K. Murphy	0.20	83.30	B190	/Makem/ Analyze emails from Elina Tilman enclosing new DFEH Complaint and analyze Complaint (.1); add new case to Verity Litigation Management Chart (.1).

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2303158

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	J.A. Moe, II	0.40	239.70	B190	/Christina Markem v. O'Connor/ Extended telephone call with Elina Tilman on responsibility to defend the DFEH Complaint (.20); exchange E-Mails with Nick Koffroth on date sale closed and E-Mail to Karleen Murphy on adding to Chart (.10); review and discuss with Elina Tilman Elspeth Paul's assessment of the case (.10).
06/24/20	K. Murphy	0.10	41.65	B190	/ Cao / Analyze email from Karen Chapman with attached case update and litigation counsel's request to retain expert.
06/24/20	K. Murphy	0.10	41.65	B190	/ Swain / Analyze minute order continuing June 25, 2020 Status Conference to December 17, 2020 and prepare update to Verity Litigation Deadline Chart re the same. .
06/24/20	J.A. Moe, II	0.10	59.93	B190	/Lisa Swain v. O'Connor/ Review Case Management Conference Statement; review subsequent e-mail from Clerk on June 25th matters off calendar.
06/24/20	J.A. Moe, II	0.10	59.93	B190	/Diem Cao v. O'Connor/ Review counsel's "Case Review" on background to and allegations asserted against O'Connor and physicians.
06/24/20	K. Murphy	0.10	41.65	B190	/ Makem / Analyze email from Karen Chapman enclosing AIG letter and email from John Moe to add reporting date to Verity Chart, and prepare chart update.
06/25/20	J.A. Moe, II	0.20	119.85	B190	/Cristina Makem v. O'Connor/ Telephone call returned to Elina Tilman on how to explain distinction between O'Connor the hospital and O'Connor the entity, and how the original and second administrative claims bar dates operate.
06/26/20	J.A. Moe, II	0.10	59.93	B190	/Cristina Makem v. O'Connor/ Review acknowledgment from AIG and E-Mail to Karleen Murphy on date of reporting.
06/26/20	J.A. Moe, II	0.10	59.93	B190	/Denise Greenwood v. O'Connor/ Review Jeff Park's E-Mail to Elina Tilman on AIG Insurance Policy.
<b>Subtotal</b>		<b>2.70</b>	<b>1,332.41</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2303158

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	241.40
B190	Other Contested Matters (excl. assumption/rejection motions)	1,332.41
Total This Matter		\$1,573.81

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
R. Garms	\$603.50	0.40	\$241.40
J.A. Moe, II	\$599.25	1.50	\$898.91
K. Murphy	\$416.50	0.80	\$333.20
K.M. Howard	\$250.75	<u>0.40</u>	<u>\$100.30</u>
Totals		3.10	\$1,573.81
Fee Total	\$	1,573.81	
Invoice Total	\$	<u>1,573.81</u>	



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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303159**

Matter: 15800425-000005  
St. Vincent Medical Center

Payment Due Upon Receipt

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Total This Invoice	\$ 8,310.68
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Chicago, IL 60606

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ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303159**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000005  
St. Vincent Medical Center

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	J.A. Moe, II	0.10	59.93	B140	/Mariabelen Basulto v. St. Vincent/ Exchange E-Mails with Nicole Podgurski on Stipulation and Order.
	<b>Subtotal</b>	<b>0.10</b>	<b>59.93</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/22/20	R. Richards	0.30	216.90	B185	Review emails re remaining contracts and leases to be rejected at St. Vincents (0.2); discuss same with Jon Emerson of BRG (0.1).
06/26/20	R. Richards	1.00	723.00	B185	Review Fifth Omnibus rejection motion and order (0.3); finish preparing and circulate Sixth Omnibus rejection motion (0.7).
	<b>Subtotal</b>	<b>1.30</b>	<b>939.90</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	J.A. Moe, II	0.10	59.93	B190	/Noboru Kato v. St. Vincent/ Review Notice received from Opposing Counsel setting Status Conference re Bankruptcy on July 2nd, and E-Mail to Karleen Murphy.
06/02/20	K. Murphy	0.10	41.65	B190	Analyze email from John Moe re recent notice of status conference and confirm calendaring of event.
06/04/20	K. Murphy	0.10	41.65	B190	/ O'Halloran / Analyze update from litigation counsel re new trial date and Final Status Conference and prepare updates to Verity Upcoming Deadline Chart.
06/04/20	K.M. Howard	0.40	100.30	B190	Analysis of status conference notice in Kato v. St. Vincent Medical Center and reviewed and revised Litigation Management chart accordingly.
06/04/20	K.M. Howard	0.40	100.30	B190	Analysis of Fraser Watson letter regarding the continuance of trial and FSC and reviewed and revised Litigation Management Chart accordingly.
06/07/20	J.A. Moe, II	0.10	59.93	B190	/Susan Chow v. St. Vincent/ Review Minute Order from the Superior Court, and hearing now scheduled for July 24th on the Motion For Summary Judgment; E-Mail to Karleen Murphy on pending Motion.
06/08/20	J.A. Moe, II	0.10	59.93	B190	/Elise O'Halloran v. St. Vincent/ Review Louise Douville's latest report on the litigation.
06/08/20	K. Murphy	0.10	41.65	B190	/ O'Halleran / Analyze email from Karen Chapman with updated case summary and analyze updated summary.
06/08/20	K.M. Howard	0.40	100.30	B190	Analysis of expert opinion in O'Halloran v. St. Vincent Medical Center and reviewed and revised Litigation Management Chart.
06/09/20	K. Murphy	0.30	124.95	B190	/ Chow / Analyze complaint and court website to determine names of all potential plaintiffs and decedent to check for proof of claim (.2); and draft email to Andres Estrada requesting claim search and draft further email to John Moe re clarification of the parties (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	J.A. Moe, II	0.20	119.85	B190	/Susan Chow v. St. Vincent/ Review the comments from Janee Tomlinson proceeding with Motion For Summary Judgment on July 9th, and whether to attend the hearing.
06/09/20	K. Murphy	0.20	83.30	B190	/ Chow / Analyze update from litigation counsel, Janee Tomlinson, re status of request for dismissal discussion with plaintiff and analysis re upcoming hearing on SVMC's motion for summary judgment (.1); and telephone call with John Moe re the same (.1).
06/10/20	K. Murphy	0.10	41.65	B190	/ Chow / Confer with John Moe re Janee Tomlinson request for Dentons to appear by phone at the hearing on SVMC's Motion for Summary Judgment to respond to any questions re bankruptcy.
06/10/20	K. Murphy	0.20	83.30	B190	/ CT Corp - Jin matter / Analyze notification from CT Corporation re subpoena for medical records to SVMC and analyze subpoena for any procedural defects or issues (.1); and draft email to Verity team enclosing the same with production date and other protocols re production (.1).
06/10/20	K. Murphy	0.70	291.55	B190	/ CT Corp - Martinez / Analyze three notifications from CT Corporation re subpoena for medical records to SVMC and analyze subpoenas for any procedural defects or issues (.2); telephone call to David Weissman as party serving subpoena to meet and confer re clarification on issues with various subpoenas and incorrect production date (.2); draft follow up email to Mr. Weissman re the same (.1); draft email to Verity team enclosing the same with production date and other protocols re production (.1); and analyze and respond to emails from Karen Chapman re the same (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	K. Murphy	0.20	83.30	B190	/ CT Corp - McCoy matter / Analyze notification from CT Corporation re subpoena for medical records to SVMC and analyze subpoena for any procedural defects or issues (.1); and draft email to Verity team enclosing the same with production date and other protocols re production (.1).
06/10/20	J.A. Moe, II	0.20	119.85	B190	/HEP Pharmacy v. St. Vincent/ Review notice on upcoming hearing and E-Mail to Karleen Murphy on representation, and exchange additional multiple E-Mails on apparent settlement of the case.
06/10/20	J.A. Moe, II	0.10	59.93	B190	/Susan Chow v. St. Vincent/ Confer with Karleen Murphy on appearance on July 9th, and necessity to determine if Susan Chow (Henry Chow or Lindsey Chow) filed a Proof Of Claim, and obtaining information from KCC.
06/11/20	J.A. Moe, II	0.10	59.93	B190	/Jin Sangyun v. Allstate - St. Vincent and Martinez v. Gabriel - St. Vincent and McCoy Staffing v St. Vincent/ Review Subpoenas for records, and review Karleen Murphy's E-Mail on conferring with Mr. Weissman on setting up new date for responding to one of the Subpoenas.
06/11/20	K. Murphy	0.10	41.65	B190	/ Hadley / Analyze email from Karen Chapman enclosing case update with summary of plaintiff's responses to SVMC's written discovery and analyze the same.
06/12/20	J.A. Moe, II	0.10	59.93	B190	/Martinez - St. Vincent/ Review E-Mail from Karleen Murphy on responding to Subpoena for Records; E-Mail to Karleen Murphy on review of the Subpoena.
06/12/20	K. Murphy	0.10	41.65	B190	/ CT Corp - Martinez / Analyze and respond to email from John Moe seeking copies of medical records to SVMC and prepare email forwarding the same to Mr. Moe.
06/12/20	K. Murphy	0.20	83.30	B190	/ Chow / Analyze further emails from John Moe and Andres Estrada of KCC re status of notice of bar date (.1); and telephone call with John Moe re potential defense re claim issue and draft email to litigation counsel requesting call to discuss the same (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	K. Murphy	0.10	41.65	B190	/ Chow / Analyze response from Andres Estrada from KCC advising no proof of claims filed by the Chows and prepare update to Verity charts re the same.
06/12/20	K. Murphy	0.30	124.95	B190	/ CT Corp - Martinez matter / Follow up telephone call with David Weissman, counsel for party seeking medical and billing records of Nicole Martinez re content of subpoenas and production date (.2); and draft email to Verity team re the same (.1).
06/14/20	K. Murphy	0.10	41.65	B190	/ Chow / Analyze response from Janee Tomlinson, litigation counsel for SVMC, re telephone call to discuss potential defense re proof of claim issue and analyze John Moe's response re the same.
06/16/20	K. Murphy	0.30	124.95	B190	/ Chow / Telephone call with Janee Tomlinson and John Moe re potential defense re proof of claim issue.
06/16/20	K. Murphy	0.40	166.60	B190	/ Kato / Draft Status Conference Statement re Bankruptcy for Non-Appearance Case Review (.2); and research Superior Court website to confirm matter date and date of filing Notice of Automatic Stay, and draft email to John Moe to review draft statement (.2).
06/16/20	K. Murphy	0.10	41.65	B190	/ Aliazis, Tricia / Draft email to Karen Chapman seeking copy of the DFEH complaint.
06/16/20	J.A. Moe, II	0.10	59.93	B190	/Noboru Kato v. St. Vincent/ Review notice on Status Conference and E-Mail to Karleen Murphy on July 2nd date for appearance.
06/16/20	J.A. Moe, II	0.30	179.78	B190	/Susan Chow v. St. Vincent/ Telephone call with Janee Tomlinson, David Ortega and Karleen Murphy, on possible additional defense to assertions made by Susan Chow.
06/16/20	K. Murphy	0.10	41.65	B190	/ Perez / Draft emails to Laurie Soledad and John Moe re upcoming status conference.
06/16/20	J.A. Moe, II	0.10	59.93	B190	/Wanda Hadley v. St. Vincent/ Review Louise Douville's report on responses to discovery and speculative nature of damages asserted in behalf of the Plaintiff.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	J.A. Moe, II	0.10	59.93	B190	/Perez v. St. Vincent/ Review notice on upcoming Status Conference and E-Mail to Karleen Murphy on hearing.
06/18/20	K.M. Howard	0.40	100.30	B190	Analysis of court's notice regarding the MSJ in Chow v. St. Vincent Medical Center and reviewed and revised Litigation Management Chart.
06/18/20	K.M. Howard	0.40	100.30	B190	Analysis of court order continuing the status conference in Perez v. St. Vincent Medical Center and reviewed and revised Litigation Management Chart.
06/18/20	J.A. Moe, II	0.30	179.78	B190	/Caesar Perez v. St. Vincent/ Review Complaint, Court Minute Order and proposed Status Conference Statement, in regard to Case Management Conference set for July 20th and reset for November (.20); review Karleen Murphy's request for CMC Statement, and E-Mail to Karleen Murphy on continued date (.10).
06/19/20	K. Murphy	0.20	83.30	B190	/ Kato / Analyze Court Minute Order re Status Conference re Bankruptcy on 7/2/20 continued and draft email to Verity team re the same (.1); and prepare update to Verity Litigation Deadline Chart (.1).
06/19/20	K. Murphy	0.20	83.30	B190	/ Fayfel / Draft email to Andres Estrada at KCC to request search for claim from Mike Fayfel and analyze KCC website to determine if claim was filed (.1); analyze email from Elina Tilman containing document filed by Mike Fayfel (mailing list) and draft email to John Moe re the same (.1).
06/20/20	K. Murphy	0.10	41.65	B190	/ Santos / Analyze email from Karen Chapman advising of case status and closure, and prepare update to Verity Litigation Management Chart re same.
06/24/20	K. Murphy	0.20	83.30	B190	/Phi / Analyze the court's order continuing the 7/30/20 Status Conference re Bankruptcy (.1); draft email to Verity Team re the same and prepare update to Verity Deadline Chart with new conference date (.1).



St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	K. Murphy	0.30	124.95	B190	/ Vann / Analyze complaint to update case list for date of incident and information re notice of intent (.1); update Verity Litigation Charts (.1); and research Court Website to determine if SVMC has been served with Summons & Complaint (.1).
06/24/20	K. Murphy	0.40	166.60	B190	/CT Corporation - Marie Davis / Analyze notices from CT Corporation for two subpoenas for Marie Davis, one for medical records and the second for billing records (.1); downloaded, analyzed, and acknowledged subpoenas (.1); telephone call and email to Kaled Zidan, counsel for the issuing party re production date (.1); and draft email to Verity Team re the same (.1).
06/24/20	K. Murphy	0.30	124.95	B190	/CT Corporation - Marie Davis / Analyze notice from CT Corporation for third subpoena for Marie Davis for films (medical records) (.1); downloaded, analyzed, and acknowledged subpoena (.1) and draft email to Verity Team re the same (.1).
06/24/20	K. Murphy	0.10	41.65	B190	/ Kato / Analyze notice of continuation of July 2, 2020 Status Conference re Bankruptcy and prepare update to Verity Litigation Management Chart re same.
06/24/20	K. Murphy	0.10	41.65	B190	/Hadley / Analyze case update from litigation counsel re plaintiff's motion for leave to amend complaint to add missing Plaintiff heir as relevant to SVMC's motion to abate action for failure to join necessary parties.
06/24/20	K. Murphy	0.10	41.65	B190	/CT Corporation - Manalo / Analyze CT Corporation notice re new subpoena and email from Elina Tilman to Verity team re the same.
06/24/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Merry / Analyze CT Corporation notice of subpoena of medical records to SVMC and draft email to Elina Tilman re the same (.1); analyze subpoena and prepare email to Verity team with instructions re the same (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	K. Murphy	0.30	124.95	B190	/ Rapp / Analyze multiple emails from John Moe, Lisa Ho, and Elina Tilman re termination date, corrected Proof of Claim number, and case facts (.1) and prepare update to Verity Litigation Management Chart (.1). email from Karen Chapman with attached case update and litigation counsel's request to retain expert (.1).
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Noboru Kato v. St. Vincent/ Review Notice of July 2nd hearing date and E-Mail to Karleen Murphy on hearing.
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Maria Davis' Subpoena to St. Vincent/ Review Karleen Murphy's E-Mail to Counsel who issued Subpoena, including rescheduling the due date for the response.
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Susan Chow v. St. Vincent/ Review and commence preparing for hearing on Motion For Summary Judgment on July 9th.
06/30/20	K. Murphy	0.10	41.65	B190	/ Graham / Analyze and respond to email from John Moe re address for Graham.
<b>Subtotal</b>		<b>10.60</b>	<b>4,485.52</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**B240 - Tax Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	C. Montgomery	0.20	160.00	B240	Phone call with D Galfus regarding tax allocation issues under APA.
	<b>Subtotal</b>	<b>0.20</b>	<b>160.00</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan , telephone call to John Schlant on revising the Chart on OCP obligations (.10); preliminarily review John Schlant's calculations in Chart prepared by John Moe, in regard to fees paid to Ordinary Course Professionals, and E-Mail to Mr. Schlant on conferring on June 18th (.10).
06/18/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review Complaint filed by Cynthia Sorto against St. Vincent asserting postpetition allegations.
06/18/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review E-Mails on prepetition claim of Elizabeth Siquian relating to St. Vincent.
06/18/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review E-Mails from Daniel Farrugia and Karleen Murphy on settlement of Yolanda Mancilla v. St. Vincent.
06/19/20	K. Murphy	0.20	83.30	B300	/Siquian / Analyze emails from Karen Chapman re insurance issue (.1) and continued conference with John Moe re calculation of administrative claims for effective date under the Plan (.1).
06/19/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of the Administrative Claims in connection with the Plan, confer with Karleen Murphy on claim asserted by Elizabeth Siquian against St. Vincent, settlement reached but bankruptcy impacting payment on prepetition claim.
06/19/20	K. Murphy	0.20	83.30	B300	/ Mancilla / Analyze Superior Court website to determine status of upcoming Post Mediation Status Conference or Mediation Setting Conference and analyze Request for Dismissal for SVMC and dismissal of entire action (.1) and draft follow up email to litigation counsel, David Weiss, to confirm the same and analyze response (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	K. Murphy	0.10	41.65	B300	/ Mancilla / Prepare updates to Verity Litigation Management Charts and Relief From Stay Chart to reflect recent settlement.
	<b>Subtotal</b>	<b>1.20</b>	<b>627.74</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	J.A. Moe, II	0.10	59.93	B310	/Dwight Rapp v. St. Francis/ Review List of Claims to be received and review Andrews Estrada's E-Mails with copies of the Claims.
	<b>Subtotal</b>	<b>0.10</b>	<b>59.93</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	G. Medina	1.70	498.53	B320	Communication with N. Koffroth regarding numerous filings (0.2); Communication with M. Zeefe regarding Application to shorten time (0.1); review and work on filing Amended Chapter 11 Plan of Liquidation (Dated June 16, 2020), Disclosure Statement Describing Amended Joint Chapter 11 Plan of Liquidation, Motion for approval of chapter 11 disclosure statement and Application Shortening Time /Setting Hearing on Shortened Notice LBR 9075-1(b) (1.0); download and send to N. Koffroth, T. Moyron and M. Zeefe (0.4).
<b>Subtotal</b>		<b>1.70</b>	<b>498.53</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	C. Doherty, Jr.	0.80	299.20	EMP	Prepare Draft 1113 Stipulation re CNA.
06/30/20	S. Maizel	0.50	400.00	EMP	Telephone conference with S. Alberts, etc. re UNAC issues.
	<b>Subtotal</b>	<b>1.30</b>	<b>699.20</b>		



St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	S. Maizel	0.10	80.00	MED/CMS	Review and respond to email from E. Levey re SVMC Medicare payments.
06/29/20	T. Moyron	0.10	59.93	MED/CMS	Analyze email regarding CMS and St. Vincent re pass through payments.
06/29/20	S. Maizel	0.30	240.00	MED/CMS	Email to P. Chadwick, etc. re CMS allegations of overpayments.
06/30/20	S. Maizel	0.50	400.00	MED/CMS	Review and respond to emails from CMS re overpayment allegations.
	<b>Subtotal</b>	<b>1.00</b>	<b>779.93</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2303159

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B140	Relief from Stay/Adequate Protection Proceedings	59.93
B185	Assumption/Rejection of Leases and Contracts	939.90
B190	Other Contested Matters (excl. assumption/rejection motions)	4,485.52
B240	Tax Issues	160.00
B300	Claims and Plan	627.74
B310	Claims Administration and Objections	59.93
B320	Plan and Disclosure Statement (incl. Business Plan)	498.53
EMP	Employee matters	699.20
MED/CMS	Medicare/CMS Issues	779.93
Total This Matter		\$8,310.68

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	0.20	\$160.00
S. Maizel	\$800.00	1.40	\$1,120.00
R. Richards	\$723.00	1.30	\$939.90
T. Moyron	\$599.25	0.10	\$59.93
J.A. Moe, II	\$599.25	3.10	\$1,857.77
K. Murphy	\$416.50	6.90	\$2,873.85
C. Doherty, Jr.	\$374.00	0.80	\$299.20
G. Medina	\$293.25	1.70	\$498.53
K.M. Howard	\$250.75	<u>2.00</u>	<u>\$501.50</u>
Totals		17.50	\$8,310.68

St. Vincent Medical Center  
Invoice #: 2303159

July 29, 2020

Fee Total	\$	8,310.68
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Invoice Total	\$	<u>8,310.68</u>
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DENTONS

Main Document

SNR Denton US LLP  
Page 5927 of 12478Suite 2500  
Los Angeles, California 90017-5704Alston Hunt Floyd & Ing is now  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303161**Matter: 15800425-000006  
St. Francis Medical Center

Payment Due Upon Receipt

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Total This Invoice	\$ 244,823.76
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303161**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000006  
St. Francis Medical Center

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	T. Moyron	1.20	719.10	AGI	Analyze S. Chan email re document requests related to bids (.1); meeting with S. Maizel regarding same (.2); analyze S. Chan response (.1); analyze Court ruling and related issues (.4); prepare a response (.3); prepare email to R. Adcock, et al. re same (.1).
06/02/20	S. Maizel	0.60	480.00	AGI	Office conference with T. Moyron re S. Chan request for documents (.3); review and respond to email from Chan re same (.2); revise draft email re same from T. Moyron (.1).
06/02/20	N. Koffroth	1.20	601.80	AGI	Draft response to S. Chan re submission of confidential bids
06/03/20	N. Koffroth	0.60	300.90	AGI	Participate in call with H. Levy-Biehl re unqualified bids
06/03/20	T. Moyron	1.70	1,018.73	AGI	Conference call with H. Levy-Biehl, et al. re AG requests and responses and other matters (.6); analyze Prime emails re AG (.3); analyze S. Chan emails (.2); prepare email to S. Chan (.1); analyze H. Levy-Biehl emails re AG matters (.3); prepare email to Prime re APA (.1) and follow up email re same (.1).
06/03/20	T. Moyron	0.30	179.78	AGI	Conference call with N. Koffroth re AG requests and responses and related matters.
06/05/20	T. Moyron	0.90	539.33	AGI	Analyze emails from S. Chan re public meeting and expert report (.1); analyze expert report (.4); prepare emails regarding same (.2); analyze H. Levy-Biehl re public meeting, etc. (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	C. Montgomery	0.30	240.00	AGI	Communications with T Moyron and H Levy-Biehl regarding Attorney General meeting notice (.1); communications with T Moyron and H Levy-Biehl regarding export report to Attorney General and review same (.2)
06/05/20	C. Montgomery	0.30	240.00	AGI	Review notice of public meeting for June 26 and communications with T Moyron and R Adcock re same (.1); begin review JD Healthcare report to AG regarding Prime transaction (.2)
06/06/20	C. Montgomery	0.70	560.00	AGI	Review JD Healthcare report to Attorney General (.5); communications with T Moyron and H Levy-Biehl regarding comparison to Prime APA (.2)
06/06/20	S. Maizel	0.10	80.00	AGI	Review and respond to Attorney General notice of public meeting.
06/08/20	T. Moyron	0.60	359.55	AGI	Analyze email from D. Eldan re submission date (.1); prepare emails to D. Eldan, et al. re same (.2); conference call with R. Adcock re same (.1); analyze stipulation (.2).
06/08/20	C. Montgomery	0.10	80.00	AGI	Communications with T Moyron and H Levy-Biehl regarding D Elden willingness to stipulate to review process commencement date.
06/08/20	N. Koffroth	1.10	551.65	AGI	Draft stipulation and order re date of commencement of AG review
06/09/20	N. Koffroth	0.40	200.60	AGI	Participate in call with H. Levy-Biehl et al. re impact statement and deal breakers letter
06/09/20	N. Koffroth	5.70	2,858.55	AGI	Draft deal breakers letter
06/09/20	S. Maizel	0.40	320.00	AGI	Telephone conference with Hope Levy-Biehl re AG deal breaker letter.
06/09/20	K.M. Howard	0.20	50.15	AGI	Analysis of the Stipulation Confirming the Date Notice Concerning the St. Francis Sale was Deemed Received.
06/09/20	T. Moyron	0.60	359.55	AGI	Analyze final version of stipulation re AG (.1); analyze emails from H. Levy-Biehl, et al. re same (.2); prepare email re same (.1); analyze matters related to request and statute (.2).
06/09/20	R. Garms	0.20	120.70	AGI	Review Prime AG letter.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	R. Garms	0.40	241.40	AGI	Review draft AG letter.
06/10/20	T. Moyron	2.50	1,498.13	AGI	Analyze and prepare AG letter (1.4); analyze and prepare comments to updated AG letter (.8); correspond with H. Levy-Biehl, et al. re AG letter (.3).
06/10/20	S. Maizel	0.40	320.00	AGI	Telephone conference with T. Moyron re AG deal breaker letter (.2); review and revise deal breaker letter to S. Chan (.2).
06/10/20	N. Koffroth	3.40	1,705.10	AGI	Draft deal breakers letter re impact statement
06/11/20	K.M. Howard	0.40	100.30	AGI	Analysis of the Order approving Stipulation Confirming Date Notice Concerning the St. Francis Sale was Deemed Received and reviewed and revised Critical Dates Memorandum as to nullifying AG deadlines.
06/11/20	T. Moyron	0.20	119.85	AGI	Analyze S. Chan, H. Levy-Biehl, et al. emails re deal breakers.
06/19/20	S. Maizel	0.60	480.00	AGI	Telephone conference with S. Chan, etc. practicing for AG's public meeting.
06/24/20	S. Maizel	0.10	80.00	AGI	Review and respond to emails re AG public meeting logistics.
06/25/20	S. Maizel	0.10	80.00	AGI	Telephone conference with T. Moyron re AG conditions issues.
06/25/20	S. Maizel	0.40	320.00	AGI	Review and respond to emails re deal breaker letters.
06/26/20	C. Montgomery	2.60	2,080.00	AGI	Observe Attorney General public proceedings.
06/26/20	S. Maizel	7.30	5,840.00	AGI	Prepare for AG public meeting re sale (.3); participate in virtual AG public meeting re sale (7.0).
06/26/20	T. Moyron	6.80	4,074.90	AGI	Attend AG public hearing re St. Francis.
06/26/20	S. Alberts	5.50	4,400.00	AGI	SFMC Sale. AG SFMC Prime approval hearing (excluding breaks).
<b>Subtotal</b>		<b>47.90</b>	<b>31,200.07</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	K.M. Howard	0.30	75.23	B110	Reviewed and culled tentative ruling regarding June 19th hearings (.2); prepared email to Verity Team regarding same (.1).
06/09/20	K.M. Howard	0.20	50.15	B110	Email exchanges with Hope Levy-Biehl regarding the matters before the court on June 10th.
<b>Subtotal</b>		<b>0.50</b>	<b>125.38</b>		



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	T. Moyron	0.70	419.48	B130	Conference call with H. Levy-Biehl, et al. re Prime document requests.
06/01/20	R. Westhoff	0.50	234.00	B130	Review email from G. Fierman re: issues with property descriptions in Asset Purchase Agreement (.1); review issues re: same (.2); emails to/from G. Fierman and C. Olson re: same (.2).
06/01/20	S. Libowsky	1.50	1,200.00	B130	Review emails to and from Verity, Dentons, DWT teams re: data and information flow to Prime (0.70), teleconference with Verity, Dentons, DWT teams on clean room, document production to Prime issues (0.80).
06/01/20	S. Maizel	0.40	320.00	B130	Telephone conference with H. Levy- Biehl, etc. re Prime information requests.
06/01/20	R. Garms	1.10	663.85	B130	Call regarding information requests and prepare for same.
06/02/20	S. Libowsky	0.50	400.00	B130	Follow-up on issues re: data and information flow to Prime.
06/02/20	A. Dondoyano	0.40	129.20	B130	Email to title company re title issue questions (0.1); Confer with T.Moyron re Disclosure Schedules and review the same (0.3).
06/03/20	A. Dondoyano	0.40	129.20	B130	Email to T.Moyron re Disclosure Schedules (0.1); Review emails from H.Levy-Biehl and M.Garms are same (0.3)
06/03/20	T. Moyron	0.30	179.78	B130	Conference call with H. Levy-Biehl, et al. re matters related to risk pool agreements.
06/03/20	T. Moyron	0.20	119.85	B130	Analyze emails from A. Ruda, et al. re Prime statements and financials.
06/03/20	R. Garms	1.40	844.90	B130	Review and summarize purchase agreement provisions regarding schedules, updates and related obligations and rights.
06/04/20	T. Moyron	0.40	239.70	B130	Analyze H. Levy-Biehl, et al. emails regarding schedules and prepare email regarding same (.3); conference call with A. Dondoyano regarding same (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	R. Westhoff	0.30	140.40	B130	Review email from C. Olson re: status of updated schedules (.1); review issues re: same (.1); review email from L. Kmiec re: 1/17th interest in parking lot (.1).
06/04/20	A. Dondoyano	0.40	129.20	B130	Email to title company re title issue questions (0.1); Confer with T.Moyron re Disclosure Schedules (0.2); Email to R.Westhoff re title issues (0.1).
06/05/20	A. Dondoyano	0.90	290.70	B130	Confer with title company and R.Westhoff re title questions (0.2); Call with Dentons team and DWT team re disclosure schedules (0.7).
06/05/20	R. Westhoff	1.70	795.60	B130	Review and analyze chain of title for 17th interest in parking lot (.9); review issues re: same (.4); prepare list of follow-up requests for title company (.2); review and respond to emails from R. DeDona re: same (.2).
06/05/20	T. Moyron	0.40	239.70	B130	Conference call with H. Levy-Biehl, M. Garms et al. re schedules to APA.
06/05/20	N. Koffroth	0.50	250.75	B130	Participate in internal call re APA schedules
06/05/20	J.A. Moe, II	0.20	119.85	B130	In regard to the Asset Purchase Agreement for St. Francis, exchange E-Mails with Adam Dondoyano on updated Exhibit on pending Litigation Matters (.10); confer with Karleen Murphy on updated Exhibit for the APA for Prime Health (.10).
06/05/20	R. Garms	0.80	482.80	B130	Call regarding schedules and follow up on same.
06/08/20	A. Dondoyano	0.40	129.20	B130	Revise closing checklist.
06/08/20	N. Koffroth	0.90	451.35	B130	Review and analyze cure issues re designation list
06/09/20	A. Dondoyano	0.10	32.30	B130	Confer with R.Westhoff and title company re title policy issues.
06/09/20	R. Westhoff	0.50	234.00	B130	Review email from L. Kmiec re: time and cost for searching additional properties with interest in shared parking lot (.2); review issues and strategy re: same (.2); emails to/from R. DeDona re: same (.1).
06/10/20	R. Westhoff	0.20	93.60	B130	Review emails from C. Olsen, G. Gertler, and H. Levy-Biehl re: updating real estate disclosure schedules.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	S. Maizel	0.50	400.00	B130	Telephone conference with Prime re contract designation.
06/10/20	K. Murphy	0.10	41.65	B130	Telephone call with John Moe re preparing updates to chart of existing litigation for purchaser pursuant to email from Adam Dondoyano.
06/10/20	A. Dondoyano	0.30	96.90	B130	Email to MWE re updated disclosure schedules (.1); Email to C.Johnson re closing checklist updates (.1); Confer with title company and R.Westhoff re title searches (.1).
06/10/20	S. Maizel	0.10	80.00	B130	Review and respond to email from UCC counsel re Healthcare Impact Statement.
06/10/20	N. Koffroth	0.50	250.75	B130	Participate in call with counsel to Prime re contract designation
06/10/20	J.A. Moe, II	0.20	119.85	B130	In regard to updating Exhibit for Prime, confer with Karleen Murphy on status of and completing updated Exhibit on pending litigation.
06/10/20	J.A. Moe, II	0.20	119.85	B130	Confer with Karleen Murphy on necessity to complete Exhibit on list of litigation matters for delivery to Prime (.1); second telephone call with Ms. Murphy on revising the expanded Exhibit on Litigation, to include Corinna Jimenez and Mariabelen Basulto (.1).
06/11/20	J.A. Moe, II	0.20	119.85	B130	Review updated Exhibit of litigation matters involving St. Francis, then prepare E-Mail transmitting the updated Exhibit for Prime Healthcare.
06/11/20	A. Dondoyano	0.70	226.10	B130	Review updated legal proceedings schedule (0.2); Confer with DWT re updates to the licensing schedule (0.2); Revise disclosure schedules (0.3)
06/12/20	R. Westhoff	0.40	187.20	B130	Review and respond to emails from G. Fierman re: entities to take title to subject properties (.2); review updated disclosure schedules (.1); review email from C. Olson re: same (.1).
06/12/20	A. Dondoyano	0.70	226.10	B130	Revise disclosure schedules (0.6); Email to MWE re same (0.1).
06/12/20	R. Garms	0.60	362.10	B130	Review updated schedules.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	T. Moyron	0.20	119.85	B130	Analyze Prime, et al., emails re contract designation.
06/15/20	S. Maizel	0.10	80.00	B130	Telephone conference with Jim Moloney re Prospect interest in assets.
06/16/20	R. Richards	0.50	361.50	B130	Review proposed language re document retention (0.1); review document retention pleadings (0.3); response re same (0.1).
06/16/20	T. Moyron	0.50	299.63	B130	Analyze email from J. Moloney re St. Francis bidder (.1); conference call with Cain, et al., re POL, sales, etc. (.4).
06/16/20	C. Montgomery	0.10	80.00	B130	Communications with J Moloney regarding new buyer interest.
06/16/20	A. Dondoyano	0.20	64.60	B130	Review updated Schedule 2.11 from DWT and revise the Disclosure Schedules.
06/16/20	S. Maizel	1.50	1,200.00	B130	Drafting outline of response to DHCS objection to sale.
06/17/20	R. Westhoff	0.10	46.80	B130	Review updated Disclosure Schedule re: real estate items.
06/17/20	A. Dondoyano	0.10	32.30	B130	Email to MWE re revised Disclosure Schedules.
06/17/20	N. Koffroth	1.90	952.85	B130	Draft letter re sale inquiry
06/17/20	C. Montgomery	0.10	80.00	B130	Review draft letter to Prospect.
06/17/20	T. Moyron	1.40	838.95	B130	Analyze and prepare letter to Prospect (1.2); analyze letters from Prospect (.2).
06/17/20	S. Maizel	0.10	80.00	B130	Telephone conference with T. Moyron re SEIU issues vis-à-vis Prime.
06/17/20	S. Maizel	0.20	160.00	B130	Review and revise letter to Prospect re correspondence.
06/18/20	C. Montgomery	0.30	240.00	B130	Review draft letter re Prospect unsolicited offer and communications with T Moyron re same.
06/18/20	S. Maizel	0.30	240.00	B130	Telephone conference (x2) with T. Moyron re response to Prospect re interest in SFMC.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/18/20	T. Moyron	1.20	719.10	B130	Conference call with 2005s advisors regarding status of sales (.6); analyze A. Ruda, P. Chadwick, et al., emails re document requests, responses and related matters (.4); analyze further emails to UNAC (.2).
06/18/20	T. Moyron	0.30	179.78	B130	Analyze and finalize letter to Prospect.
06/18/20	T. Moyron	1.10	659.18	B130	Conference call with N. Koffroth regarding Prospect's letters (.3); conference call with N. Koffroth regarding analysis of APA and response to Prospect (.8).
06/19/20	T. Moyron	0.10	59.93	B130	Analyze H. Levy-Biehl, et al., emails re licenses and CHOW.
06/19/20	T. Moyron	0.30	179.78	B130	Conference call with R. Adcock re letter to Prospect (.2); analyze final draft (.1).
06/19/20	C. Montgomery	0.60	480.00	B130	Phone call with T Moyron regarding Prospect response letter and related plan issues.
06/19/20	N. Koffroth	1.80	902.70	B130	Draft letter re sale inquiry
06/19/20	S. Maizel	0.30	240.00	B130	Review and respond to emails re LA Times ad.
06/22/20	S. Maizel	0.10	80.00	B130	Telephone conference with G. Pillari re Prospect interest in assets.
06/22/20	T. Moyron	0.20	119.85	B130	Analyze R. Adcock, et al. emails and reply to same re ad (.1); call with S. Maizel re same (.1).
06/22/20	K.M. Howard	0.20	50.15	B130	Email exchanges concerning the APA for St. Francis Medical Center.
06/23/20	A. Dondoyano	0.10	32.30	B130	Review revised closing checklist from C.Johnson.
06/24/20	S. Maizel	0.10	80.00	B130	Review and respond to email from T. Patterson re Prospect.
06/25/20	S. Maizel	0.50	400.00	B130	Telephone conference with Lori Mihalich-Levin, etc. re GME issues raised by Prime.
06/25/20	L. Mihalich-Levin	0.90	631.13	B130	Consult with S. Maizel, T. Moyron, and J. Keville regarding GME rotator issues related to sale of St. Francis Medical Center (.4); review background materials regarding same and advise regarding GME cost reporting issues (.5).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	S. Maizel	0.10	80.00	B130	Review and respond to emails re GME issues raised by Prime.
06/29/20	T. Moyron	0.10	59.93	B130	Analyze P. Chadwick and J. Moloney email re MPT financing.
06/29/20	S. Maizel	0.50	400.00	B130	Review and respond to emails re HQAF obligations.
06/29/20	S. Maizel	0.30	240.00	B130	Telephone conference with Nantworks re Prime issues.
06/30/20	T. Moyron	0.10	59.93	B130	Analyze J. Schlant email and attachments re data room.
06/30/20	N. Koffroth	0.30	150.45	B130	Participate in weekly call with R. Adcock, J. Moloney, et al. re sale status
<b>Subtotal</b>		<b>36.40</b>	<b>21,180.45</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	J.A. Moe, II	0.20	119.85	B140	/Mariabelen Basulto v. St. Francis/ Exchange E-Mails with and telephone call from Andres Estrada on Notice served, no Claim filed and no Claim scheduled.
06/02/20	K.M. Howard	0.40	100.30	B140	Analysis of Cardinal Health's Notice of Motion and Motion for Relief from Stay and reviewed and revised Critical Dates Memorandum accordingly.
06/02/20	J.A. Moe, II	0.80	479.40	B140	/Mariabelen Basulto v. St. Francis/ Review Andres Estrada's E-Mail on service of Notice and E-Mail to Ms. Podgurski on address for Ms. Basulto (.20); E-Mail to Karen Chapman (.10); telephone call to Haig Arabian and confer with Michael Gonzalez on the litigation (.20); review draft Stipulation and Order on relief from stay (.10); exchange multiple E-Mails with Karen Chapman and Kathleen Conway, and telephone call with Ms. Conway on insurance (.20).
06/03/20	J.A. Moe, II	0.70	419.48	B140	/Cardinal Health/ Preliminarily review Motion For Relief From Stay and the Memorandum Of Points And Authorities in support of the Motion, seeking the right of setoff against prepetition claims (.30); exchange E-Mails with Tania Moyron and Patrick Maxcy, and transmit Motion and Memorandum to Mr. Maxcy (.20); telephone call returned to James Behrens on response to Motion For Relief From Stay (.10); E-Mail to James Behrens and review Patrick Maxcy's E-Mail on negotiations with Cardinal (.10).
06/03/20	P. Maxcy	0.50	369.75	B140	Conference with Cardinal counsel re settlement of setoff claims and advise T. Moyron on same.
06/03/20	S. Maizel	0.40	320.00	B140	Review and respond to email from H. Kevane re Cardinal relief from stay motion.
06/03/20	T. Moyron	0.40	239.70	B140	Analyze notice regarding motion for relief from stay re Cardinal (.1); exchange emails with P. Maxcy, et al. re same (.2); exchange emails with Committee counsel re anticipate resolution (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	T. Moyron	0.20	119.85	B140	Analyze Committee reply (.1); exchange emails with Committee counsel regarding Cardinal (.1).
06/04/20	J.A. Moe, II	0.90	539.33	B140	/Mariabelen Basulto v. St. Francis/ Review and revise first draft of the proposed Stipulation and proposed Order on relief from stay (.40); E-Mail to Karen Chapman on address for the Basulto (.10); exchange E-Mails with Karen Chapman on addresses (.20); E-Mail to Nicole Podgurski on 811 West 99th Street Los Angeles address (.10); exchange E-Mails with Nicole Podgurski on addresses for Mariabelen Basulto (.10).
06/04/20	K.M. Howard	0.20	50.15	B140	Analysis of the court's notice setting the hearing on Cardinal's Motion for Relief from Stay and reconciled same with Critical Dates Memorandum.
06/05/20	P. Maxcy	1.40	1,035.30	B140	Work on settlement of Cardinal motion for stay relief.
06/05/20	G. Miller	3.20	1,414.40	B140	Draft stipulation re cardinal motion for stay relief (2.2); calls with P. Maxcy and J. Emerson re same (1.0)
06/10/20	P. Maxcy	0.40	295.80	B140	Emails and communications re Cardinal stipulation.
06/10/20	G. Miller	1.40	618.80	B140	Revise stipulation re Cardinal motion for stay relief.
06/10/20	G. Miller	0.40	176.80	B140	Draft order approving Cardinal motion for stay relief.
06/11/20	J.A. Moe, II	0.10	59.93	B140	/Cardinal Health/ Review with Malka Zeefe the status of the pending Motion For Relief From Stay, and review prior communications on the Motion.
06/11/20	J.A. Moe, II	0.20	119.85	B140	/Mariabelen Basulto v. St. Francis/ Assemble and review documents in regard to completing proposed Stipulation on relief from stay on the basis that Claimant will only pursue insurance.
06/11/20	P. Maxcy	0.60	443.70	B140	Edit Cardinal stipulation.
06/11/20	G. Miller	0.20	88.40	B140	Revise stipulation re Cardinal motion for stay relief.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	J.A. Moe, II	0.10	59.93	B140	/Cardinal Health/ Exchange E-Mails with Patrick Maxcy on resolution of Cardinal Motion.
06/13/20	G. Miller	0.60	265.20	B140	Revise stipulation re: cardinal motion for stay relief.
06/14/20	S. Maizel	0.30	240.00	B140	Review and revise stipulation to settle Cardinal stay relief motion.
06/15/20	P. Maxcy	0.30	221.85	B140	Review changes to Cardinal settlement.
06/15/20	G. Miller	0.20	88.40	B140	Emails with Cardinal counsel re draft stipulation resolving Cardinal stay relief motion.
06/16/20	P. Maxcy	0.40	295.80	B140	Review comments on Cardinal settlement and discussions re same.
06/17/20	T. Moyron	0.20	119.85	B140	Analyze M. Caruso, et al., emails and response to same re Cardinal settlement.
06/17/20	J.A. Moe, II	0.50	299.63	B140	/Mariabelen Basulto v. St. Francis/ Review and revise the first draft of the Stipulation on relief from stay, with information on the status of St. Francis (.3); E-Mail to Nicole Podgurski on completing the Stipulation and Order (.1); review and correct the Stipulation and Order and transmit to Ms. Podgurski (.1).
06/17/20	K.M. Howard	0.40	100.30	B140	Analysis of Stipulation and Proposed Order regarding the relief from stay in Basulto v. St. Francis Medical Center and reviewed and revised Litigation Management Chart.
06/17/20	K.M. Howard	0.40	100.30	B140	Analysis of the Stipulation between Verity and Cardinal Health resolving the issues concerning the automatic stay and reviewed and revised Critical Dates Memorandum accordingly.
06/17/20	G. Medina	0.50	146.63	B140	Communication with G. Miller regarding filing Stipulation Resolving Cardinal Health, Inc.'s Motion for Relief from the Automatic Stay (0.1); filed stipulation and uploaded order (0.4).
06/18/20	K.M. Howard	0.40	100.30	B140	Analysis of the order approving stipulation resolving Cardinal Health's Motion for Relief from Stay and reviewed and revised Critical Dates Memorandum.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	J.A. Moe, II	0.10	59.93	B140	/Eduardo Vasquez v. St. Francis/ Review draft Stipulation on potential resolution of Claim, and exchange E-Mails with Bob Richards on contacting opposing counsel.
06/22/20	J.A. Moe, II	0.10	59.93	B140	/Mariabelen Basulto v. St. Francis/ Exchange E-Mails with Karleen Murphy on how to deal with proposed Stipulation on relief from stay.
06/24/20	T. Moyron	0.20	119.85	B140	Analyze motion for relief from stay filed by Phillips Medical Capital (.1); and exchange correspondence regarding same (.1).
06/24/20	K.M. Howard	0.40	100.30	B140	Analysis of Philips Medical Capital's Motion for Relief from Stay and the court's Notice of Hearing and reviewed and revised Critical Dates Memorandum.
06/24/20	J.A. Moe, II	0.30	179.78	B140	Review Motion For Relief From Stay filed by Phillips Medical Capital, then prepare E-Mail to Dentons, BRG and Hope Levy-Biehl, on newly filed Motion and the Motion's allegations, exchanging E-Mails on response.
06/25/20	J.A. Moe, II	0.30	179.78	B140	/Phillips Medical Capital/ Review E-Mail from Tania Moyron and E-Mail to Verity, Dentons and BRG personnel on responding to the Motion (.10); exchange E-Mails with Peter Chadwick, Bob Richards and Tania Moyron on responding to the Motion, and the necessity to assemble background information (.20).
06/25/20	P. Maxcy	0.20	147.90	B140	Check status of Cardinal settlement.
06/29/20	T. Moyron	0.20	119.85	B140	Correspond with P. Chadwick, et al. re Phillips Medical Capital relief from stay motion and equipment.
06/29/20	J.A. Moe, II	0.10	59.93	B140	/Jessica Moritaya v. St. Francis/ Exchange E-Mails with Karleen Murphy on the fact that no relief from stay has been granted.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	J.A. Moe, II	0.60	359.55	B140	/Phillip Medical/ Telephone call with Opposing Counsel Marshall Goldberg, on possible resolution of the Motion, and necessity to obtain pertinent information on the return of equipment and telephone call with Margaret Pfeiffer on pick up of equipment (.10; E-Mails to Mr. Goldberg on pick up of equipment and check cut on the payment (.20); exchange E-Mails with Tania Moyron on withdrawal of Motion (.10); telephone call to Ms. Pfeiffer on contact from Phillips, and telephone call to Mr. Goldberg on receipt of information (.20).
<b>Subtotal</b>		<b>19.40</b>	<b>10,435.78</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/03/20	J.A. Moe, II	0.10	59.93	B185	/Quadramed and Picis/ In regard to telephone call with Schuyler Carroll, review the Objection Of Quadramed Affinity Corporation And PICIS Clinical Solutions Inc., To Notices To Counterparties To Executory Contracts And Unexpired Leases Of The Debtors That May Be Assumed And Assigned.
06/03/20	N. Koffroth	0.70	351.05	B185	Draft memorandum analyzing cure objections
06/03/20	T. Moyron	0.20	119.85	B185	Call with H. Kevane re United (.1); prepare email to H. Kevane re timeline (.1).
06/05/20	T. Moyron	0.30	179.78	B185	Conference call with R. Adcock, P. Chadwick, et al. re Quadramed (.3).
06/09/20	K.M. Howard	0.30	75.23	B185	Analysis of Stipulation for Rejection of Various Agreements between United Healthcare and St. Francis Medical Center and Associated Setoff and reconciled with Critical Dates Memorandum.
06/10/20	T. Moyron	0.70	419.48	B185	Conference call with Prime, BRG, et al. re lease designation (.5); exchange emails with Prime, et al. re same (.2).
06/10/20	N. Koffroth	0.50	250.75	B185	Participate in call with counsel to KForce re contract assumption
06/11/20	K.M. Howard	0.40	100.30	B185	Analysis of Order Approving Rejection Stipulation between St. Francis and United Healthcare noting deadline for UHC to file a claim from the closing date.
06/12/20	K.M. Howard	0.10	25.08	B185	Reviewed email from H. Kevane regarding updated contract list and reviewed P. Chadwick's reply thereto.
06/15/20	N. Koffroth	0.40	200.60	B185	Draft St. Francis notice re assumption designation list
06/16/20	K.M. Howard	0.20	50.15	B185	Analysis of Debtors' Notice of Executory Contracts and Unexpired Leases Designated by Prime Healthcare for Assumption and Assignment.
06/29/20	N. Koffroth	0.30	150.45	B185	Participate in call with J. Richlin, G. Gertler, et al. re lease issues

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	K.M. Howard	0.20	50.15	B185	Reviewed tentative (.1) and reviewed email exchanges regarding status of matters before the court on July 1, 2020 (.1).
<b>Subtotal</b>		<b>4.40</b>	<b>2,032.80</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review Non Appearance Case Review Status Report, and telephone call to Karleen Murphy on modifying the Report regarding Steve Sharrer.
06/02/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Telephone call with Karleen Murphy on drafting the Case Management Conference Statements and contacting Steve Sharrer on availability for hearing. .
06/02/20	K. Murphy	0.20	83.30	B190	/ CT Corp-Efrain Sanchez/ Analyze CT Corp notice of medical subpoena for records of Efrain Sanchez and analyze and respond to email from Elina Tilman where Ms. Tilman advised that she will handle the email to Karen Chapman re subpoena (.1); and analyze email from Elina Tilman to Verity Team advising of subpoena and conditions of the same, and draft email to John Moe re same (.1).
06/02/20	K. Murphy	0.20	83.30	B190	/ Nguyen / Confer with John Moe re approval to file draft of Status Conference Statement re Bankruptcy (.1) and draft email to Steve Sharrer enclosing draft of statement to confirm the terms of the same as to inability to travel to California (.1).
06/03/20	K. Murphy	0.10	41.65	B190	/Sorto/ Analyze and respond to email from John Moe re continued status conference.
06/03/20	J.A. Moe, II	0.10	59.93	B190	/Leonard Harris v. St. Francis/ Preliminarily review the Complaint and the Mediation Statement, in connection with upcoming Mediation with Carney Shegarian; request copy of letter sent to Mr. Shegarian on the automatic stay.
06/03/20	J.A. Moe, II	0.20	119.85	B190	/Cynthia Sorto v. St. Francis/ Review notice regarding June 4th Case Management Conference, and E-Mail to Karleen Murphy on June 4th hearing; review Master Calendar on all Cases.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/03/20	J.A. Moe, II	0.80	479.40	B190	/Leonard Harris v. St. Francis/ Telephone call returned to Elina Tilman on preparing for Mediation (.10); review and annotate the seven page analysis of the case (.30); telephone call with Elina Tilman on preparing for Mediation and discussing defenses (.40).
06/03/20	J.A. Moe, II	0.10	59.93	B190	/People v. Gonzalez - Efrain Sanchez v. St. Francis/ Review Subpoena delivered to St. Francis for Medical Records; E-Mail to Karleen Murphy on Subpoena.
06/04/20	K.M. Howard	0.40	100.30	B190	Analysis of mediation pleadings in Harris v. St. Francis Medical Center and reviewed and revised Litigation Management Chart accordingly.
06/04/20	S. Maizel	0.20	160.00	B190	Review and respond to emails re discovery in WSNA litigation.
06/04/20	S. Maizel	0.20	160.00	B190	Review and respond to emails re discovery in WSNA litigation.
06/05/20	K. Murphy	0.10	41.65	B190	/ Nguyen / Draft email to Steve Sharrer enclosing draft of Statement re Non-Appearence Case Review to confirm statement re unavailability.
06/05/20	K. Murphy	0.20	83.30	B190	/ Nguyen / Analyze response email from Steve Sharrer re draft of status conference statement and email from Elina Tilman advising of medical leave under FMLA (.1); and prepare edits to statement to reflect the same and draft email to John Moe and Elina Tilman for review of revised draft statement (.1).
06/05/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ E-Mail to Steve Sharrer, review draft Case Management Statement, and E-Mail to Karleen Murphy on changing time for continued hearing.
06/07/20	K. Murphy	0.20	83.30	B190	/ Nguyen / Analyze emails from John Moe and Elina Tilman re revisions to draft of Statement re Non-Appearence Case Review relating to unavailability of Steve Sharrer (.1); and prepare edits to draft re the same for final review by John Moe and Elina Tilman (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/07/20	J.A. Moe, II	0.20	119.85	B190	/Natalie Nguyen v. St. Francis/ Review exchange of E-Mails with Karleen Murphy and Elina Tilman, on revisions to Case Management Conference Statement, related to both Family Leave and COVID 19, then E-Mail to Ms. Murphy and Ms. Tilman on revised Statement.
06/08/20	J.A. Moe, II	0.30	179.78	B190	/Natalie Nguyen v. St. Francis/ Review revised series of Case Management Conference Statements. and exchange E-Mails with Karleen Murphy and Elina Tilman on change in language, also conferring with Elina Tilman on language.
06/08/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Confer with Elina Tilman on upcoming Mediation and authority for Memorandum Of Law on amending Claims (.10); second telephone call with Ms. Tilman reviewing and modifying paragraph on relief from stay in the Case Management Conference Statement (.10).
06/08/20	K. Murphy	0.10	41.65	B190	/ Sorto / Analyze email from Karen Chapman forwarding email from Mr. Zhao from AIG re notice of coverage letter to be prepared in the near future.
06/08/20	K. Murphy	0.20	83.30	B190	/ Nguyen / Confer with John Moe and Elina Tilman re revision language for draft of Status Conference Statement re Bankruptcy (.1), and finalize the same (.1).
06/09/20	K. Murphy	0.10	41.65	B190	/ Rubio / Analyze fax re US Legal Support re copy of x-ray records for Rubio and draft email to litigation counsel. Mike Gonzalez, to forward the same.
06/09/20	J.A. Moe, II	0.10	59.93	B190	/Moritaya v. St. Francis/ Review notice of upcoming Case Management Conference with the date in July, and exchange E-Mails on first post-COVID 19 Conference.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	J.A. Moe, II	0.30	179.78	B190	/Leonard Harris v. St. Francis/ Telephone call with Elina Tilman requesting review, then review the Case Management Conference Statement and E-Mail to Ms. Tilman on approval (.10); second telephone call with Elina Tilman on upcoming Mediation and approval to file Memorandum Of Law on amendment of Claims and possibly the Barton Doctrine (.20).
06/09/20	J.A. Moe, II	0.10	59.93	B190	/Alicia Rubio v. St. Francis/ Review request for X-Rays in connection with Alicia Rubio Litigation, and E-Mail to Karleen Murphy.
06/09/20	J.A. Moe, II	0.20	119.85	B190	/Cynthia Sorto v. St. Francis/ Review and respond to Hope Levy Biehl's E-Mail on Mediation, and telephone call to Ms. Levy-Biehl's office on conferring on the self insured retention.
06/10/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Conference telephone call with An Ruda, Elina Tilman and Tania Moyron on upcoming Mediation in July, preparing Memorandum on administration of Claims, review of the Barton Doctrine and Sam Maizel's arguments at previous Mediations.
06/11/20	K.M. Howard	1.60	401.20	B190	Reviewed email from J. Moe regarding a Notice of Stay in Basulto v. St. Francis (.1); telephone conference with J. Moe regarding same (.1); reviewed complaint filed in LASC (.3); prepared Notice of Stay of Proceedings and Proof of Service (.3); reviewed conformed petition packages and assembled applicable Petitions to attach as exhibits to Notice of Stay (.2); finalized same and prepared email to John Moe regarding same (.2) reviewed and revised Litigation Management chart (.4).
06/11/20	J.A. Moe, II	0.30	179.78	B190	/Mariabelen Basulto v. St. Francis/ E-Mail to and confer with Kathryn Howard on filing and service of a Notice Of Stay (.10); review, prepare and assemble, and execute, then instructions on filing and service of the Notice of Stay (.20).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	K.M. Howard	0.40	100.30	B190	Analysis of court's notice continuing the non-appearance case review in Nguyen v. St. Francis Medical Center and reviewed and revised Litigation Management Chart.
06/16/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen / Analyze email from Elina Tilman seeking confirmation of status of Non-Appearance Case Review re Bankruptcy on June 23, 2020 and analyze court website and related minute order re continuation due to COVID (.1); response to Elima Tilman's email advising of continuation and update Verity Litigation Upcoming Deadline Chart re same (.1).
06/16/20	K. Murphy	0.20	83.30	B190	/ Carcamo / Analyze and respond to email from Elina Tilman re upcoming status conference and joint report re the same (.1); and telephone call to John Moe to discuss the same (.1).
06/16/20	K. Murphy	0.10	41.65	B190	/ Sorto / Draft email to Karen Chapman seeking reporting date information of matter to carrier.
06/16/20	K. Murphy	0.20	83.30	B190	/ Watson / Analyze email from John Moe re docket reminder for upcoming OSC re dismissal (.1); analyze court website re the same as Verity Chart lists case as closed with no further hearing dates and draft response email to John Moe confirming case closure (.1).
06/16/20	K. Murphy	0.10	41.65	B190	/ Ancira / Analyze case update from litigation counsel.
06/16/20	J.A. Moe, II	0.10	59.93	B190	/Sonniah Ahinasi v. St. Francis/ Review notice regarding upcoming Case Management Conference, and exchange E-Mails with Karleen Murphy on July 13th date.
06/16/20	J.A. Moe, II	0.20	119.85	B190	/Rosa Carcamo v. St. Francis/ Review the proposed draft of the Case Management Conference Statement and upcoming Mediation, then confer with Karleen Murphy on allowing BZBM to prepare the Statement, noting in the Statement relief from stay and Mediation scheduled to proceed before the next Superior Court Conference.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review Elina Tilman's E-Mail and Karleen Murphy's response, in regard to Karen Chapman's appearance; review Court Order on August 13th extended date.
06/16/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Confer with Karleen Murphy outlining research project for Memorandum to be presented to Mediator in connection with the Mediation.
06/17/20	J.A. Moe, II	0.20	119.85	B190	/Bethania Watson v. St. Francis/ Review notice on Order To Show Cause re Dismissal, and E-Mail to Karleen Murphy on hearing on July 17th; confer with Karleen Murphy on resolution of the Claim.
06/18/20	K.M. Howard	0.40	100.30	B190	Analysis of email regarding case closure in Watson v. St. Francis Medical Center, reviewed LASC docket to confirm same and reviewed and revised Litigation Management Chart.
06/18/20	K. Murphy	0.10	41.65	B190	/ Harris / Analyze and respond to email from John Moe re letter to Plaintiff's counsel re automatic stay.
06/18/20	J.A. Moe, II	0.50	299.63	B190	/Leonard Harris v. St. Francis/ Review Elina Tilman's inquiry on filing Statement in the Superior Court in connection with the status of the case, review of the Barton Doctrine, and E-Mail to Ms. Tilman on not filing a supplemental pleading on the Barton Doctrine (.10); telephone call from Elina Tilman on preparing for the Mediation (.10); prepare rough draft of Memorandum Of Law on amending a Claim (.30).
06/19/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Review proposed Case Management Statement, then telephone call with Elina Tilman on two brief revisions.
06/20/20	J.A. Moe, II	0.10	59.93	B190	/Perez/Hita v. St. Francis/ Review E-Mails from Alexander Watson, Jessica Cynowiec and Kathleen Conway on background to the case, discussion with Plaintiff's counsel, and recommendation on and acceptance of current strategy.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/20/20	J.A. Moe, II	0.10	59.93	B190	/Eduardo Vasquez v. St. Francis/ Review Bob Richard's E-Mail and proposed Stipulation on relief from stay transmitted to Attorney John Gerard.
06/22/20	K.M. Howard	0.30	75.23	B190	Reviewed email from J. Moe regarding Flores v. St. Francis Medical Center (.1); reviewed material from client (.1); prepared email to J. Moe regarding findings (.1).
06/22/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Telephone call from Karleen Murphy on contents of the Case Management Conference Statement, then review Docket and exchange E-Mails with Karleen Murphy on appearance on June 24th.
06/22/20	K. Murphy	0.20	83.30	B190	/ Harris / Analyze and respond to emails from Elina Tilman re request to continue upcoming status conference and draft of Mrs. Tilman's prepared status conference statement (.1); and confer with John Moe additional preparation of Bankruptcy Counsel's statement to advise of parameters of the stipulation on relief from stay for mediation purposes (.1).
06/22/20	K. Murphy	0.40	166.60	B190	/ Harris / Analyze and respond to emails from Elina Tilman and John Moe re upcoming status conference, mediation, and request to continue until after the postponed mediation (.1); prepare initial draft of Case Management Statement (.1); telephone call with John Moe re current draft (.1); and prepare edits to finalize draft per required edits from Elina Tilman and John Moe. (.1).
06/22/20	K. Murphy	0.40	166.60	B190	/ Flores / Analyze email from Karen Chapman and attached initial case evaluation and conferred with John Moe re the same (.1); analyzed initial case evaluation for information to add case to Verity Charts (.1) and draft additions to Verity Litigation Management Charts with new case (.2).
06/23/20	J.A. Moe, II	0.20	119.85	B190	/Luz Flores v. St. Francis/ Exchange E-Mails with and brief telephone call with Karleen Murphy on new Medical Malpractice Case and inclusion in the Master Chart.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	J.A. Moe, II	0.10	59.93	B190	/Rosa Carcamo v. St. Francis/ Review the proposed Joint Case Management Statement, and E-Mail to Elizabeth Ferguson on Mediation on June 30th.
06/23/20	J.A. Moe, II	0.10	59.93	B190	/Richard Navarro v. St. Francis/ Review the notice regarding Case Management Conference, and E-Mail to Karleen Murphy on case proceeding.
06/23/20	J.A. Moe, II	0.20	119.85	B190	/Natalie Nguyen v. St. Francis/ Preliminarily review new Complaint (third action) filed by Natalie Nguyen, and exchange E-Mails on triple actions filed by Ms. Nguyen.
06/24/20	K. Murphy	0.10	41.65	B190	/ Harris / Telephone call with John Moe regarding upcoming Case Management Conference as to question regarding relief from the automatic stay for mediation.
06/24/20	K. Murphy	0.60	249.90	B190	/ Harris / Prepare for attending Case Management Conference by analyzing conference statements by Plaintiffs, SFMC, and Specially Appearing Counsel for SFMC (.1); attend conference (.3); prepare report to Verity Team re the same (.1); and prepare updates to Verity Litigation Management Chart (.1).
06/24/20	K. Murphy	0.20	83.30	B190	/Nguyen / Telephone call with John Moe re Plaintiff's small claims matter (.1); and analyze email from John Moe seeking copy of Labor complaint and research the file to locate the same and send to John Moe (.1).
06/24/20	K. Murphy	0.10	41.65	B190	/Iris Hernandez / Analyze minute order re Status Conference re Bankruptcy and confer with John Moe re the same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	J.A. Moe, II	1.40	838.95	B190	/Natalie Nguyen v. St. Francis/ Confer with Karleen Murphy on issue of service of the Summons and Complaint of new Superior Court Case, then discuss initial assertions by Ms. Nguyen in first of three actions and obtaining initial Claim filed with Department of Industrial Relations (.20); telephone call with Elina Tilman on new Complaint and fact Complaint contains no specific allegations (.20); review new Complaint (.10); research background to the case (Including the Notice Of Claim And Conference filed with the Department of Industrial Relations) , and prepare letter on the automatic stay (.40); telephone call with Karleen Murphy on Small Claims Complaint (.10); revise letter based on inter-relationship between Department of Industrial Relations case, Small Claims Complaint and new Complaint (.40);
06/24/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Confer with Karleen Murphy in preparation for Case Management Conference, on limited relief from stay to pursue Mediation (.10); preliminarily review the first draft of the Memorandum Of Law on bankruptcy issues to be filed in regard to the upcoming July 17th Mediation (.10).
06/24/20	J.A. Moe, II	0.10	59.93	B190	/German Ramirez v. St. Francis/ Review letter from Plaintiff's Counsel Marcus Mancini on notification of possible claim.
06/24/20	J.A. Moe, II	0.40	239.70	B190	/Iris Fernandez v. St. Francis/ Review the Order issued by the Superior Court on OSC re Sanctions, and confer with Karleen Murphy on status of the Case (.20); telephone call returned to Michael Gonzalez, on OSC, and necessity to file Statement as required by the Court's Order and return call to Ms. Murphy on non-appearance case reviews (.20).
06/24/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen / Analyze new complaint in unlimited jurisdiction and prepare updates to Verity Litigation Management Chart with unlimited jurisdiction case (.1); and add new matter to Verity Litigation Deadline Chart (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	K. Murphy	0.30	124.95	B190	/ Baby Perez / Analyze multiple emails from Karen Chapman and Jessica Cynowiec re notice of intent and plaintiff's settlement demand package (.1); analyze case summary to add new case to Verity Litigation Management Charts (.1) and prepare edits to charts (.1).
06/24/20	K. Murphy	0.30	124.95	B190	/ Ahinasi / Analyze and respond to email from Elina Tilman re upcoming Case Management Conference (.1); analyze San Bernardino Court website to determine if matter remains on calendar (.1); and prepare draft of statement and email enclosing statement to John Moe and Elina Tilman for review (.1).
06/25/20	J.A. Moe, II	0.20	119.85	B190	/Natalie Nguyen v. St. Francis/ Revise final version of letter being sent to Natalie Nguyen on imposition of the automatic stay.
06/25/20	J.A. Moe, II	0.10	59.93	B190	/Iris Hernandez v. St. Francis/ Exchange E-Mails with Sam Maizel on status of the Order To Show Cause.
06/25/20	J.A. Moe, II	0.60	359.55	B190	/Aaron Raj v. St. Francis/ Review Aaron Raj "complaint" filed with the DLSC on rest time wages allegedly due for 736 days, then E-Mail to Karleen Murphy on assertion of Aaron Raj (.20); telephone call from Elina Tilman on Aaron Raj and request for letter directed to Mr. Raj's attorney (.10); review letter sent on imposition of the automatic stay, request to Ms. Tilman and receive and review Zev Abramson's letter (.20); confer with Elina Tilman on BZBM drafting formal response to the DLSC Complaint and possible complete defense on failure to file a Proof Of Claim (.10).
06/25/20	J.A. Moe, II	0.30	179.78	B190	/Leonard Harris v. St. Francis/ Review and revise first draft of Confidential Mediation Brief on amending claim (.20); review revised Brief and transmit to Karleen Murphy (.10).
06/26/20	J.A. Moe, II	0.10	59.93	B190	/Aaron Raj v. St. Francis/ Review E-Mails from Elina Tilman and Andres Estrada on service of three Notices on Aaron Raj.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	J.A. Moe, II	0.10	59.93	B190	/Ahinasi v. St. Francis/ Review E-Mail from Elina Tilman and E-Mails to Elina Tilman and Karleen Murphy on Case Management Conference Statement.
06/26/20	J.A. Moe, II	0.10	59.93	B190	/Aaron Raj v. St. Francis/ Telephone call with Elina Tilman discussing a letter on Aaron Raj's failure to file a Claim.
06/26/20	J.A. Moe, II	0.10	59.93	B190	/Jessica Moritaya v. St. Francis/ Review Discovery propounded to third parties and served on Verity and St. Francis.
06/26/20	J.A. Moe, II	0.40	239.70	B190	/Aaron Raj v. St. Francis/ Review Elina Tilman's E-Mails on information, then prepare draft of letter to Nelida Contreras on why Mr. Raj can assert no claim against St. Francis (and telephone call to Mr. Tilman on three Notices served on Aaron Raj).
06/26/20	K. Murphy	0.20	83.30	B190	/ Diane Nguyen / Prepare for drafting Status Conference Statement re Bankruptcy by analyzing prior minute order continuing last conference and previous report (.1); and prepare draft statement for John Moe and Elina Tilman review (.1).
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Ancira Mateo v. St. Francis/ Review Subpoena from a physician directed to the Guardian Yolanda Frias, and E-Mail to Karleen Murphy on receipt of Subpoena.
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Sonniah Ahinasi v. St. Francis/ Review proposed Case Management Conference Statement and E-Mail to Karleen Murphy on filing Statement; review "letter of receipt" from AIG.
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Brian Braun v. Gary Flannery & St. Francis/ Review Mike Gonzalez' analysis of case and E-Mail to Karleen Murphy on case.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	K. Murphy	0.40	166.60	B190	/ Aguirre / Analyze LA Superior Court website for complaint to confirm date of incident, and download and analyze initial and first amended complaint (.1); confer with John Moe re the same (.1); draft further email to Andres Estrada to determine if Plaintiff filed a Proof of Claim (.1); and draft email to Karen Chapman seeing 90 day Notice of Intent to Sue letter to determine incident date. (.1).
06/30/20	K. Murphy	0.10	41.65	B190	/ Carcamo / Draft email to litigation counsel, Elizabeth Ferguson, re upcoming Status Conference.
06/30/20	K. Murphy	0.10	41.65	B190	/ Ahinasi / Draft email to litigation counsel, Elina Tilman, enclosing filed Status Conference Statement re Bankruptcy Status.
06/30/20	J.A. Moe, II	0.10	59.93	B190	/Rosa Carcamo v. St. Francis/ Review E-Mails to and from Karleen Murphy and Elizabeth Ferguson on upcoming Status Conference and necessity to file Statement on bankruptcy cases.
06/30/20	J.A. Moe, II	0.10	59.93	B190	/Rosa Carcamo v. St. Francis/ Review E-Mail and telephone call with Karleen Murphy on settlement of case (and necessity to update reports).
06/30/20	J.A. Moe, II	0.20	119.85	B190	/Eduardo Vasquez v. St. Francis/ Review Bob Richard's and John Gerard's E-Mails on settlement Stipulation, then prepare E-Mail to Karen Chapman on insurance coverage.
06/30/20	J.A. Moe, II	0.10	59.93	B190	/Aaron Raj v. St. Francis/ Telephone call with Elina Tilman and Karleen Murphy on status of the Aaron Raj action, and continuing work on letter to the government official.
<b>Subtotal</b>		<b>20.20</b>	<b>10,026.73</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	K. Murphy	0.50	208.25	B300	Prepare updates to SFMC chart of litigation matters re recently served cases against SFMC.
06/19/20	K. Murphy	0.20	83.30	B300	/Sorto / Analyze emails from Karen Chapman re insurance issue (.1) and continued conference with John Moe re calculation of administrative claims for effective date under the Plan (.1).
06/19/20	K. Murphy	0.10	41.65	B300	/Aliazis / Continued conference with John Moe re calculation of administrative claims for effective date under the Plan.
06/19/20	K. Murphy	0.20	83.30	B300	/ Sorto / Analyze AIG letter re coverage for analysis needed for the Plan re EPL claims (.1); and confer with John Moe re the same (.1).
06/19/20	K. Murphy	0.20	83.30	B300	/ Aliazis / Analyze DFEH complaint to determine amount of potential damages at issue (.1); and confer with John Moe re the same (.1).
06/19/20	K. Murphy	0.10	41.65	B300	/ Aliazis / Draft email to Luzann Fernandez seeking confirmation of settlement valuation figure as needed for information for the Plan.
06/19/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, review discrimination claim asserted by Tricia Aliazis and potential obligation; review AIG Loss Run on reporting of claim.
06/19/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, confer with Karleen Murphy on necessity to continue to review information on claims.
06/19/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of Administrative Claims, review with Karleen Murphy the assertions and coverage issues and letter from AIG, in regard to Cynthia Sorto v. St. Francis (.10); second telephone call with Karleen Murphy on the background to the claim and setting amount of the SIR (.20).
06/20/20	K. Murphy	0.10	41.65	B300	/ Perez / Analyze email from Karen Chapman advising of settlement demand.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, E-Mail to Karleen Murphy on including Perez/Hita v. St. Francis in the Master Chart on claims.
06/29/20	K.M. Howard	0.20	50.15	B300	Telephone conference with J. Moe regarding administrative claims (.1); reviewed charts regarding same (.1).
06/29/20	J.A. Moe, II	0.10	59.93	B300	/Cristina Makem v. St. Francis/ Review Elina Tilman's E-Mail on coverage issues, and Karleen Murphy's E-Mail on reporting but no coverage.
06/29/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, review date AIG acknowledged receipt of Claim, and E-Mail to Karleen Murphy on addition to the Chart.
06/30/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, exchange E-Mails with Elina Tilman on Claims of Dwight Rapp against St. Francis.
<b>Subtotal</b>		<b>2.50</b>	<b>1,172.61</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020


**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	K.M. Howard	0.50	125.38	B310	Reviewed and assembled pleadings and documents pertaining to Medline's Motion for Payment of Expense Administrative Claim (.4); prepared email to Verity Team regarding same (.1).
	<b>Subtotal</b>	<b>0.50</b>	<b>125.38</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	S. McCandless	1.20	958.80	EMP	  review Prime welcome letter and press release (.30).
06/01/20	C. Doherty, Jr.	8.50	3,179.00	EMP	Prepare 1113 Declarations per Scheduling Order (6.0); gather exhibits for same and instruct re use and filing package (1.0); calls re strategy with Dentons team (.4); prepare stipulation and orders re 1113 relief (1.1)
06/01/20	K.M. Howard	0.40	100.30	EMP	Analysis of Stipulation continuing hearing and applicable deadlines regarding Debtors' 1113 Motions and reviewed and revised Critical Dates Memorandum accordingly.
06/01/20	A. Shiran	0.50	257.25	EMP	
06/01/20	S. Alberts	1.60	1,280.00	EMP	SFMC. Communications with SEIU and UNAC about extension (.3) and response to UNAC questions (.2); review and comment update Declaration report ton 1113 (.5); review and revise stipulation extending time (.3) and call to Court on stipulation (.1) and finalize stipulation (.2).
06/02/20	S. Alberts	0.90	720.00	EMP	SFMC. Review order approving adjournment (.1); communications about UNAC and SEIU meetings (.2); obtain and review (.1) and provide PTO information requested by UNAC (.2); follow up with S. Sharrer about updating information (.1); obtain, review and forward updated info to UNAC (.2).
06/02/20	K.M. Howard	0.20	50.15	EMP	Analysis of the order approving the stipulation regarding the filing of UNAC's objection to Debtors' Motion to Reject CBA and reconciled same to Critical Dates Memorandum

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	K.M. Howard	0.40	100.30	EMP	Analysis of the order approving stipulation extending deadlines for SEIU to object to Debtors' Motion to Reject CBA and reviewed and revised Critical Dates Memorandum accordingly.
06/02/20	C. Doherty, Jr.	0.20	74.80	EMP	Respond to emails re 1113 Stipulation and Process
06/04/20	S. Alberts	1.10	880.00	EMP	SFMC 1113. Communicate with co-counsel and others about status of UNAC and SEIU negotiations and information request (.7); communicate with UNAC about 1113 proposal (.1); communicate with co-counsel about 1113 hearing issues in light of this week's discussions (.3).
06/04/20	C. Doherty, Jr.	3.60	1,346.40	EMP	Prepare 1113 Declarations per Court's Scheduling Order (2.4); draft email memos re 1113 strategy and issues for hearing (.5); calls with team re strategy (.7)
06/04/20	T. Moyron	0.70	419.48	EMP	Analyze A. Ruda, et al., correspondence regarding document requests and responses (.3); conference call with S. Alberts regarding same (.3); prepare email to A. Ruda, et al. re process (.1).
06/05/20	S. Alberts	0.70	560.00	EMP	SFMC 1113. Confer with working group (.4); communications with co-counsel on status of discussions (.2); receive communications about recruiting issue (.1).
06/05/20	S. Maizel	0.50	400.00	EMP	Telephone conference with A. Ruda, R. Adcock, etc. re labor issues.
06/05/20	T. Moyron	0.70	419.48	EMP	Conference call with A. Ruda, R. Adcock, et al. re labor matters (.5); analyze S. Sharrer, et al. emails re same (.2).
06/05/20	T. Moyron	0.40	239.70	EMP	Analyze A. Ruda, R. Adcock, et al. emails re status of labor matters (.2); analyze emails from J. Richlin re IPAs, labor matters (.2).
06/05/20	C. Doherty, Jr.	1.30	486.20	EMP	Prepare 1113 Declarations (.5); attention to emails re 1113 Declarations (.3); attend call re 1113 process (.5)
06/05/20	N. Koffroth	0.50	250.75	EMP	Participate in call with R. Adcock, P. Chadwick, et al. re statements re financials.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/07/20	C. Doherty, Jr.	2.50	935.00	EMP	Call with Ms. Moyron re Revising 1113 Declarations (.5); revise same (1.8); attention to emails re 1113 Declarations (.2)
06/07/20	T. Moyron	0.70	419.48	EMP	Analyze declarations (.2); conference call with C. Doherty re declarations (5) re UNAC and SEIU.
06/07/20	S. Alberts	1.00	800.00	EMP	SFMC. Receive and 1113 Review Notice and A. Ruda declaration, made revisions and circulate.
06/08/20	T. Moyron	0.50	299.63	EMP	Analyze final versions of declarations (.2); prepare comments to notice (.1); analyze A. Ruda, et al. emails (.2).
06/08/20	C. Doherty, Jr.	5.90	2,206.60	EMP	Prepare 1113 Declarations for Filing (4.4) ; calls re same (.5); gather and organize exhibits re same (1.0)
06/08/20	S. Alberts	3.10	2,480.00	EMP	SFMC 1113. Review declarations (.2); communicate with C. Doherty (.1); modify Declaration and send to C. Doherty to conform (1.0); receive UNAC letter and review (.2); revise UNAC declaration materials (.4) and oversee final changes for filing (1.0); communicate with Prime in advance of 1113 hearing (.2).
06/08/20	K.M. Howard	0.30	75.23	EMP	Analysis of Notice and Declarations attached thereto summarizing the status of negotiations with SEIU to determine additional deadlines.
06/08/20	K.M. Howard	0.30	75.23	EMP	Analysis of Notice and Declarations attached thereto summarizing the status of negotiations with UNAC to determine additional deadlines.
06/08/20	T. Moyron	0.20	119.85	EMP	Analyze emails from Prime and Prime's counsel re labor matters.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	S. Alberts	8.30	6,640.00	EMP	SFMC 1113. Communicate with Prime about call in preparation of 1113 hearing (.1) and with co-counsel (.1); prepare for tomorrow's hearing (4.8); communicate with Prime in advance of hearing (.5); follow up with A. Ruda (.4); review tentative ruling and assess (.4); confer with co-counsel regarding tentative ruling (.4); communicate with client (.3); communicate with Prime (.8); confer with T. Moyron (.2); notify unions of decision to address tentative ruling (.1); communication about and send PTO info to UNAC (.2).
06/09/20	S. Maizel	0.10	80.00	EMP	Review tentative rulings re union 1113 motions for SEIU and UNAC.
06/09/20	S. Maizel	0.50	400.00	EMP	Telephone conference with R. Adcock, etc. re 1113 motion issues.
06/09/20	S. Maizel	0.80	640.00	EMP	Telephone conference with Prime re 1113 motion issues.
06/09/20	C. Doherty, Jr.	4.80	1,795.20	EMP	Review Court's Tentative Ruling re 1113 Motion (.5); draft email memorandum re issues raised in tentative re potential reply (1.7); prepare declaration for potential reply for 1113 motion (.7); calls with clients and team re hearing (1.7); attention to and respond to emails re filing of Supplemental Declarations (.2)
06/09/20	J.A. Moe, II	0.10	59.93	EMP	Review the Stipulation For Rejection Of Various Agreements Between United Healthcare And St. Francis Medical Center And Setoff.
06/09/20	J.A. Moe, II	0.20	119.85	EMP	Review Tentative Rulings on CBAs with UNAC and with SIEU.
06/09/20	K.M. Howard	0.60	150.45	EMP	Reviewed and culled documents and pleadings pertaining to Debtors' 1113 Motion to Reject Collective Bargaining Agreement with SEIU (.5); prepared emails to Verity Team regarding same (.1).
06/09/20	K.M. Howard	0.60	150.45	EMP	Reviewed and culled documents and pleadings pertaining to Debtors' 1113 Motion to Reject Collective Bargaining Agreement with UNAC (.5); prepared emails to Verity Team regarding same (.1).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/09/20	K.M. Howard	0.40	100.30	EMP	Analysis of tentative ruling regarding Debtors' 1113 Motion to Reject Lease/Contract re CBA with SEIU and reviewed and revised Critical Dates Memorandum accordingly.
06/09/20	K.M. Howard	0.40	100.30	EMP	Analysis of Tentative Ruling regarding Debtors' 1113 Motion to Reject CBA with UNAC and reviewed and revised Critical Dates Memorandum accordingly.
06/09/20	K.M. Howard	0.20	50.15	EMP	Email exchanges with T. Moyron and C. Doherty regarding Debtors' Declaration regarding the status of negotiations with SEIU including culling information from the docket regarding the Declaration.
06/09/20	K.M. Howard	0.20	50.15	EMP	Email exchanges with A. Ruda, S. Alberts and C. Doherty regarding the matters before the court on June 10th.
06/09/20	K.M. Howard	0.20	50.15	EMP	Reviewed Caitlin Gray's Declaration and exhibits (.1); prepared emails to Verity Team regarding same (.1).
06/09/20	T. Moyron	2.20	1,318.35	EMP	Conference call with A. Ruda, S. Alberts, et al. re labor matters (.3); conference call with Prime re labor matters (.5); analyze tentative ruling re motions to reject (.3); conference call with R. Adcock, et al. re tentative ruling (.3); conference call with Prime, et al. re hearing (.5); conference call with R. Adcock re labor (.1); conference call with S. Alberts re hearing (.2).
06/09/20	S. Maizel	0.30	240.00	EMP	Telephone conference with S. Alberts, etc. re SEIU negotiations.
06/09/20	S. Maizel	0.90	720.00	EMP	Telephone conference with Prime, etc. re labor negotiations (.6); telephone conference with An Rhuda, etc. re same (.3).
06/10/20	S. Maizel	0.70	560.00	EMP	Telephone conference with R. Adcock, etc. re 1113 issues.
06/10/20	C. Doherty, Jr.	2.00	748.00	EMP	Attend Hearing re 1113 SFMC Motion (1.3); review emails sent in preparation for hearing (.3); review informational emails sent re 1113 informational requests (.2); locate prior form of order re 1113 motion (.2)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	T. Moyron	1.70	1,018.73	EMP	Attend telephonic hearing re section 1113 motions (1.3); conference call with P. Chadwick re same (.2); conference call with D. Galfus re same (.1); conference call with S. Alberts re same (.1).
06/10/20	S. Alberts	6.00	4,800.00	EMP	SFMC 1113. Communicate with S. Sharrer (.1) and send to UNAC counsel individual PTO data and password (.1); prepare for hearing on 1113 by organizing information, summarizing and otherwise preparing argument (4.3); hearing on 1113 relief (1.2); follow up with co-counsel (.1); confer with A. Ruda concerning discovery responses and next steps (.2).
06/10/20	N. Koffroth	1.30	651.95	EMP	Participate in hearing re 1113 motions
06/11/20	S. Alberts	0.40	320.00	EMP	SFMC 1113. Receive UNAC request for meeting dates and initial communication with co-counsel (.2); consider follow up with Prime or union requests (.2).
06/12/20	C. Montgomery	0.50	400.00	EMP	Participate in phone conference with A Ruda, S Alberts, P Chadwick, J Schlant regarding section 1113 rejection information requests.
06/12/20	K.M. Howard	0.40	100.30	EMP	Analysis of the updated Order Setting Final Hearing on Debtors' Motion to Reject Collective Bargaining Agreement with UNAC and reviewed and revised Critical Dates Memorandum.
06/12/20	K.M. Howard	0.40	100.30	EMP	Analysis of the updated Order Setting Final Hearing on Debtors' Motion to Reject Collective Bargaining Agreement with SEIU and reviewed and revised Critical Dates Memorandum.
06/12/20	S. Alberts	2.70	2,160.00	EMP	SFMC. Draft response to UNAC inquiry on meetings and send to A. Ruda (.6); draft proposed response to discovery for UNAC and SEIU (.5) and circulate for review (.1); communicate with working group concerning responses to discovery (.6); revise and forward discovery communication to UNAC (.2) and SEIU (.2); follow up with UNAC (.3); receive and respond to further communication from SEIU (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	C. Doherty, Jr.	0.20	74.80	EMP	Review email correspondence sent re 1113 negotiations .
06/13/20	S. Alberts	0.40	320.00	EMP	
06/15/20	S. Alberts	4.40	3,520.00	EMP	SFMC 1113. Email with C. Doherty (.1); contact BRG regarding status of data available review (.1) and follow up (.1); follow up with UNAC on QAF (.1); send PTO info to Prime (.1); schedule call with Prime and working group (.2); review materials created by BRG in response to union information requests (.3); follow up with BRG on certain documents (.2); communicate with working group and Prime (1.5); request and receive from SEIU form of letter in order to insert responses (.1); draft responses to SEIU requests and circulate (1.3); follow up on data productions (.3).
06/15/20	T. Moyron	1.10	659.18	EMP	Conference call with Prime regarding document requests re UNAC and SEIU.
06/15/20	T. Moyron	0.40	239.70	EMP	Analyze correspondence from P. Chadwick, et al., related to UNAC and SEUI document requests, responses and status.
06/15/20	C. Doherty, Jr.	2.40	897.60	EMP	Call with Mr. Alberts re 1113 process (.1); prepare reply for 1113 Motions (1.7); attention to emails re production for 1113 process (.3); provide comments to RFI response to SEIU (.3)
06/16/20	C. Doherty, Jr.	7.10	2,655.40	EMP	( ) prepare 1113 Reply (6.8)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	S. Alberts	3.10	2,480.00	EMP	SFMC 1113. Email to A. Ruda regarding upcoming UNAC meeting (.1); communicate with P. Chadwick concerning data room items (.2); and C. Doherty (.2); draft and send to UNAC production update and notice of data room and circulate for approval (.2); obtain approval and send to UNAC (.1) and follow up from UNAC (.3); send similar information to SEIU about data room (.2); draft response to UNAC RFI 3 and circulate internally (1.6); obtain comment and send to Prime (.2).
06/16/20	S. Maizel	0.60	480.00	EMP	Telephone conference with R. Adcock re section 1113 issues.
06/17/20	T. Moyron	0.40	239.70	EMP	Analyze draft responses to SEIU questions (.2); analyze emails from P. Chadwick, et al., re production of documents (.2).
06/17/20	C. Doherty, Jr.	4.50	1,683.00	EMP	[REDACTED] prepare 1113 Reply (4.1)
06/17/20	S. Alberts	1.70	1,360.00	EMP	SFMC. 1113. Review proposed Prime and BRG changes to SEIU 6/15 letter and UNAC RFI #3, revised and recirculate (1.0) and then forward to UNAC (.1) and SEIU (.1); assist in document production (.3); receive, review and comment on proposed BRG financials to post in data room (.2).
06/18/20	S. Alberts	0.60	480.00	EMP	SFMC 1113. Communicate with T. Moyron about data production (.1); [REDACTED] communicate with C. Doherty about SEIU requests and data room (.1) and follow up (.1).
06/18/20	C. Doherty, Jr.	8.60	3,216.40	EMP	[REDACTED] prepare 1113 Reply (8.4)
06/19/20	C. Doherty, Jr.	2.60	972.40	EMP	Prepare 1113 Reply.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	S. Alberts	0.80	640.00	EMP	SFMC 1113. Receive and review define contribution benefits for UNAC and send to UNAC (.2); review prior wage order materials and follow up with BRG concerning Defined Benefit contribution information (.3); review and communication from Prime (.1) and approach (.1); receive inquiry on UNAC's request to Prime and respond (.1).
06/19/20	T. Moyron	0.60	359.55	EMP	Analyze R. Adcock, et al., emails re Prime (.2); analyze emails from Prime re labor matters (.2); analyze emails from A. Ruda, et al. re same (.2).
06/19/20	T. Moyron	0.20	119.85	EMP	Analyze J. Schlant, et al., emails re labor requests and responses.
06/20/20	C. Doherty, Jr.	3.20	1,196.80	EMP	Prepare Reply for 1113 Motion (3.0) ; draft email memo re 1113 discovery (.2)
06/22/20	C. Doherty, Jr.	7.40	2,767.60	EMP	Prepare Reply for 1113 Motion (6.9); review emails exchanged between parties re 1113 process (.3); call with Mr. Alberts re strategy (.2)
06/22/20	S. Alberts	2.70	2,160.00	EMP	SFMC 1113. Draft communication to go to UNAC (.6) and model SEIU on UNAC communication with appropriate revisions (.2) concerning Defined Benefit Pension Plan issues and conclusion of discovery, circulate to working group (.2); follow up with J. Schlant and then WTW about pension issues (.4); revise and communication to UNAC (.2) and SEIU (.2); confer with C. Doherty concerning 1113 reply (.2); receive response from UNAC regarding production issue (.1) and follow up communications re production issues (.3) and status of negotiations (.1); follow up on 1113 pleading issues (.2).
06/23/20	K.M. Howard	0.50	125.38	EMP	Email exchanges with K. Persaud regarding transcript of hearing on 1113 motions (.1); received and reviewed hearing transcript (.2); prepared email to Verity Team regarding same (.1); subsequent email with S. Alberts regarding same (.1).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	T. Moyron	1.10	659.18	EMP	Analyze UNAC correspondence (.2); analyze A. Ruda, et al., emails re labor matters and document responses (.4); conference call with S. Alberts re same (.5).
06/23/20	C. Doherty, Jr.	2.70	1,009.80	EMP	Prepare Reply for 1113 Motions (2.4); [REDACTED]
06/23/20	S. Alberts	4.80	3,840.00	EMP	SFMC 1113. Communicate with A. Ruda about status of union and Prime discussions (.4); review summary of document production from BRG and cross referenced it (.2); communicate with J. Schlant regarding production issues (.8); and follow up to working group (.3); confer with working group about insurance issues (.6); communications about UNAC's SFMC new positional statement and issues raised thereby and provide initial thoughts to counter and follow up (.4); draft response to SFMC's alleged counter (1.6) and send to C. Doherty to review (.1); confer with C. Doherty about changes (.1); review proposed changes from C. Doherty and circulated to wider professional group (.1); communicate with C. Doherty about discovery stipulation process and status of reply brief in favor of 1113 (.2) .
06/23/20	S. Maizel	0.50	400.00	EMP	Telephone conference with R. Adcock, etc. re labor issues.
06/23/20	C. Montgomery	0.70	560.00	EMP	Communications with T Moyron [REDACTED] [REDACTED]
06/24/20	S. Alberts	4.60	3,680.00	EMP	SFMC 1113. Revise and expand response to UNAC "Counterproposal" and circulate with explanatory note to team members (1.2); discussion with group about UNAC "proposal" (.4); revise response to UNAC "counter proposal" in light of discussion and additional factual determination and circulate (2.0); follow up (.2); review proposal and communications with other contingent buyer and assess (.4); communicate with C. Doherty about reply (.2) and related issues (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	C. Doherty, Jr.	3.90	1,458.60	EMP	Prepare Reply for 1113 Motions (2.5); prepare communications to unions re 1113 process (.7); prepare research memo re 1113 Proposal for UNAC (.4); email memos regarding Discovery Stipulations (.3)
06/25/20	C. Doherty, Jr.	3.30	1,234.20	EMP	Prepare Reply for 1113 Motions (2.7); prepare communications to unions re 1113 process (.6)
06/25/20	S. Alberts	2.90	2,320.00	EMP	SFMC 1113. Review comments from BRG and C. Doherty and revise UNAC Counterproposal (.5) and follow up with client (.2); obtain further changes and revise and coordinate changes (.7) and send to Prime (.1); receive and review   send response to UNAC (.1); begin review of 1113 Reply and related issues (.5).
06/25/20	T. Moyron	0.80	479.40	EMP	Analyze and prepare comments re UNAC (.3); analyze R. Adcock, J. Richlin, et al., emails re same (.3); conference call with S. Alberts re same (.1); analyze final response (.1).
06/26/20	S. Alberts	4.40	3,520.00	EMP	SFMC 1113. Review and comment on 1113 Reply (2.3); draft and circulate letter to UNAC in response to June 8 letter (1.3) and follow up (.2); receive email from J. Kohanski concerning meet and confer and follow up with co-counsel (.2); receive stipulation and draft email to J. Kohanski (.2); obtain final changes and send to J. Kohanski (.1) and scheduled call (.1).
06/26/20	C. Doherty, Jr.	1.60	598.40	EMP	Prepare comments to union correspondence re 1113 proposal (.5); call with BZBM re declaration for 1113 reply (.2); provide research for AG Hearing re employment issues (.3); prepare discovery stipulation for UNAC (.6)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/27/20	C. Doherty, Jr.	3.80	1,421.20	EMP	Prepare Reply for 1113 Motions (3.3); call with Mr. Alberts re strategy; prepare comments to 1113 correspondence to UNAC (.3); respond to question regarding severance law (.2)
06/27/20	S. Alberts	1.70	1,360.00	EMP	SFMC 1113. Receive UNAC RFI 4, review, assess prior written productions and communicate with BRG about responses (.5); confer with C. Doherty about reply and UNAC RFI 4. (.2); communicate with working group regarding letter to K. Kohanski in response to June 8 letter, update, verify a fact and minor revision and send to J. Kohanski (.3); update call time with UNAC (.1); receive, review and respond to BRG info request summary in response to UNAC request RFI 4 (.2); communicate with Prime about upcoming 1113 hearing (.2); communicate with working group concerning severance calculations (.2).
06/28/20	S. Alberts	4.70	3,760.00	EMP	SFMC 1113. Re-review and note court tentative ruling and UNAC opposition and review draft reply and analyze changes to response (3.2), Conference with C. Doherty regarding response changes (.3), Call with working group on UNAC RFI 4.0 (1.2).
06/28/20	C. Doherty, Jr.	5.60	2,094.40	EMP	Call with BRG and Dentons re 1113 information sharing (1.2); call with Mr. Alberts re reply (.3); prepare 1113 Reply (4.1)
06/28/20	S. Maizel	1.20	960.00	EMP	Telephone conference with J. Schlant, S. Alberts, etc re UNAC request for information.
06/29/20	T. Moyron	3.40	2,037.45	EMP	Analyze and prepare reply re UNAC and SEIU re 1113 motions.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	S. Alberts	11.80	9,440.00	EMP	<p>SFMC 1113. Review and draft response to RFI 4 and send for internal review (1.8), follow up revision with received and additional comments and send to client for review (.3), [REDACTED]</p> <p>[REDACTED], communicate with UNAC concerning RFI 4 and impact on discuss and response to Stipulation (.4), receive review and prepare for call [REDACTED]</p> <p>[REDACTED] communicate with UNAC and Prime about stipulation (1.0), communicate with J. Kohanski about 1113 Proposal (.1), communicate about SEIU Rule 26 stipulation (.1), review stipulation and made comment (.2), revise reply and follow up communication regarding same (7.2).</p>
06/29/20	T. Moyron	1.90	1,138.58	EMP	Conference call with UNAC, et al. (1.0); conference call with C. Doherty, et al. re UNAC matters (.7); conference call with M. Zeefe re decs and background (.2).
06/29/20	M. Zeefe	2.60	1,248.65	EMP	Call with T. Moyron re 1113 Reply and supporting declarations (0.2); call with T. Moyron, C. Doherty, N. Koffroth re same (0.4); review draft reply and create P. Chadwick declaration in support (2.0).
06/29/20	C. Doherty, Jr.	9.10	3,403.40	EMP	Prepare Reply and Discovery Stipulation for 1113 Motion, including by attending teleconference with UNAC (.5); draft and prepare Reply document (4.4) ; gather Exhibits for Reply (2.0); calls with Ms. Moyron and Mr. Koffroth re Reply (.7); prepare 7026-1 Stipulation (1.5)
06/29/20	S. Maizel	0.60	480.00	EMP	Telephone conference with J. Kohanski, etc. re UNAC issues.
06/29/20	N. Koffroth	3.50	1,755.25	EMP	Participate in internal call re 1113 reply (0.8); draft 1113 reply re UNAC and SEIU (2.7).
06/30/20	S. Maizel	0.40	320.00	EMP	Telephone conference with BRG, R. Adcock, etc. re labor issues.
06/30/20	N. Koffroth	1.20	601.80	EMP	Participate in internal calls re 1113 reply and related declarations x2 (1.0), (0.2)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	N. Koffroth	10.70	5,366.05	EMP	Draft reply in support of 1113 motions re SEIU and UNAC and related declarations in support thereof
06/30/20	T. Moyron	1.70	1,018.73	EMP	Analyze and prepare S. Alberts declaration (.2); correspond regarding same (.2); analyze and prepare A. Ruda declaration (.3); correspond regarding same (.1); prepare correspondence regarding coordination of documents and filing (.2); and respond to same (.1); analyze BZBM emails re declarations and related matters (.2); analyze comments to reply and updated reply (.4).
06/30/20	T. Moyron	0.20	119.85	EMP	Conference call with M. Zeefe re Chadwick declaration.
06/30/20	T. Moyron	0.60	359.55	EMP	Conference call with N. Koffroth re reply and related documents and finalization of same.
06/30/20	G. Medina	5.40	1,583.55	EMP	Review list of Exhibits to Section 1113 reply received by C. Doherty and communicate regarding unreadable exhibit. (0.4); Call with T. Moyron regrading exhibits and preparation for filing (0.1); Work on preparation and assembly of exhibits for Section 1113 reply (4.9).
06/30/20	T. Moyron	2.80	1,677.90	EMP	Conference call with C. Doherty, et al re facts in reply, appendix, etc. (.4); analyze comments on stipulation from J. Schlant, S. Alberts (.4); conference call with I. Hsu re declaration and other matters (.3); analyze UNAC 6.30 letter (.1); conference call with S. Alberts re same (.2); prepare email regarding same (.1); conference call with R. Adcock, et al. re labor matters (.5); coordinate preparation of reply, stipulation, and declarations (.4); analyze J. Schlant, emails re stipulation (.2); analyze P. Chadwick declaration (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	T. Moyron	4.80	2,876.40	EMP	Conference calls with I. Hsu re S. Alberts declaration (.2), (.1); Conference call with M. Zeefe, et al. re BRG declaration and related documents and responses re Reply (1.0); conference call with with BRG, et al. re P. Chadwick Declaration re Reply (.9); conference call with UNAC, et al. re responses (.4); prepare reply and references to exhibits (2.2).
06/30/20	C. Doherty, Jr.	13.60	5,086.40	EMP	Prepare Reply and Discovery Stipulation for 1113 Motion, prepare for and including by attending teleconference with UNAC (.6); draft and prepare Reply document (3.7) ; gather Exhibits for Reply (2.5); prepare 7026-1 Stipulation (1.7); prepare and comment on Ruda Decl; prepare and comment on Chadwick Decl (1.3); prepare and comment on Alberts Decl. (1.3) ; calls with team re same (2.5)
06/30/20	I. Hsu	6.70	2,989.88	EMP	Phone calls and drafting of declaration for 1113 Reply.
06/30/20	T. Moyron	0.20	119.85	EMP	Analyze and prepare comments to letter re UNAC (.1); analyze related emails from R. Adcock, et al. (.1).
06/30/20	M. Zeefe	7.20	3,457.80	EMP	Emails re draft 1113 reply (0.1); call with T. Moyron re same (0.2); continue drafting P. Chadwick declaration thereto (4.9); call with J. Schlant re same (0.1); call with T. Moyron, C. Doherty, N. Koffroth re same (1.0); call with P. Chadwick, J. Schlant, T. Moyron, C. Doherty, N. Koffroth re same (0.9).
06/30/20	S. Alberts	9.80	7,840.00	EMP	SFMC. Labor. Review A. Ruda comments to draft final pleading/reply and respond (.3), review reply, revise and otherwise work on facts section of reply brief (1.4), and follow up with T. Moyron on brief structure (.2), communicate with C. Doherty about reply issue (.2), receive, assess and forward to client just received UNAC letter seeking rescheduling of hearing and statements on 1113 Proposal (still no UNAC counterproposal) (.2), conference with T. Moyron about UNAC letter and responding (.2), communicate with C. Doherty on need for abrogation principal

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					authority for response to UNAC letter (.1), obtain abrogation authority and draft response to UNAC letter (1.2), obtain comments to letter and assess and add (.1), and send to client for approval (.1) obtain client's approval to form RFI response to RFI 4 (.1) and made final revisions (.4) and send to UNAC responses to RFI 4 (.1), communicate with BRG about data base upload of five additional documents (.1); review J. Schlant's comments to Rule 7026 Stipulation (.3) and supplement responses and circulate for internal review (1.5), receive comments to Stipulation and modify (.4) and send to Prime for review (.1), communicate with UNAC regarding status of response to RFI 4 (.1) and follow up (.1), obtain Prime no objection and send to UNAC in advance of 7:30 pm call (.1), Rule 7026 call (.5) and follow up with T. Moyron (.2), obtain, review and revise draft response and send to N. Koffroth for input (1.5) and follow ups concerning status of various documents (.3).
06/30/20	D. Pina	1.40	446.25	EMP	Coordinate and work with G. Medina on preparation of exhibits to 1113 Reply.
	<b>Subtotal</b>	<b>276.20</b>	<b>152,028.07</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	R. Richards	0.20	144.60	INS	Emails re tail insurance coverage.
	<b>Subtotal</b>	<b>0.20</b>	<b>144.60</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	S. Maizel	0.20	160.00	MED/CMS	Review and respond to emails re CMS offset.
06/07/20	S. Maizel	0.50	400.00	MED/CMS	Review and revise CMS settlement proposal re provider agreement.
06/08/20	S. Maizel	0.60	480.00	MED/CMS	Telephone conference with Elan Levey and Angela Belgrove, etc. re CMS settlement.
06/15/20	S. Maizel	0.90	720.00	MED/CMS	Revising CMS settlement agreement.
06/15/20	T. Moyron	0.20	119.85	MED/CMS	Analyze R. Adcock, et al., emails re CMS settlement agreement.
06/16/20	S. Maizel	0.20	160.00	MED/CMS	Review and respond to emails re CMS settlement proposal.
06/17/20	K.M. Howard	0.40	100.30	MED/CMS	Analysis of the Stipulation extending Verity and DHHS deadlines and continuing the hearing regarding the transfer of Medicare Provider Agreements and reviewed and revised Critical Dates Memorandum.
06/17/20	T. Moyron	0.30	179.78	MED/CMS	Analyze H. Levy-Biehl, et al., correspondence re CMS settlements (.2); analyze redline (.1).
06/18/20	K.M. Howard	0.40	100.30	MED/CMS	Analysis of order approving third stipulation continuing DHHS objection deadlines and the hearing and reviewed and revised Critical Dates Memorandum.
06/18/20	S. Maizel	0.50	400.00	MED/CMS	Review and respond to emails re CMS settlement proposal.
06/19/20	S. Maizel	0.30	240.00	MED/CMS	Review and respond to emails re CMS negotiations.
06/24/20	S. Maizel	0.10	80.00	MED/CMS	Telephone conference with R. Adcock re CMS issues.
06/24/20	S. Maizel	0.30	240.00	MED/CMS	Telephone conference with G. Gertler re CMS issues.
06/29/20	S. Maizel	0.30	240.00	MED/CMS	Telephone conference with Elan Levey and Angela Belgrove re CMS settlements.
06/30/20	S. Maizel	0.50	400.00	MED/CMS	Revise CMS settlement agreement.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	N. Koffroth	0.30	150.45	MED/CMS	Draft stipulation and order re HHS objection to transfer of provider agreements
	<b>Subtotal</b>	<b>6.00</b>	<b>4,170.68</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	A. Dondoyano	1.00	323.00	MED/DHCS	Review emails from Prime and R.Westhoff re disclosure schedules and review file and revise disclosure schedules re same.
06/02/20	S. Maizel	0.20	160.00	MED/DHCS	Review Prime revisions to proposed settlement with DHCS.
06/07/20	S. Maizel	0.80	640.00	MED/DHCS	Drafting correspondence to K. Wang re settlement with DHCS.
06/07/20	S. Maizel	0.50	400.00	MED/DHCS	Review and revise DHCS settlement proposal re provider agreement.
06/09/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to settlement proposal from DHCS.
06/10/20	S. Maizel	0.30	240.00	MED/DHCS	Email to Ken Wang re settlement discussion on Medi-Cal Provider Agreement.
06/11/20	S. Maizel	0.30	240.00	MED/DHCS	Telephone conference with Ken Wang, etc. provider agreement issues.
06/11/20	S. Maizel	0.90	720.00	MED/DHCS	Draft emails re settlement proposal from DHCS to client.
06/11/20	S. Maizel	0.20	160.00	MED/DHCS	Review settlement communications from K. Wang and emails re same.
06/12/20	S. Maizel	0.10	80.00	MED/DHCS	Telephone conference with T. Moyron re DHCS issues.
06/12/20	S. Maizel	0.40	320.00	MED/DHCS	Review BRG chart re DHCS claims against SFMC and respond with questions.
06/12/20	S. Maizel	0.80	640.00	MED/DHCS	Draft settlement proposal for DHCS.
06/14/20	S. Maizel	0.50	400.00	MED/DHCS	Review and revise DHCS settlement proposal.
06/15/20	T. Moyron	0.30	179.78	MED/DHCS	Analyze issues related to DHCS and correspondence to DHCS.
06/15/20	S. Maizel	0.50	400.00	MED/DHCS	Emails to Ken Wang regarding DHCS settlement proposal.
06/16/20	S. Maizel	0.20	160.00	MED/DHCS	Telephone conference with Ken Wang re settlement discussions over provider agreements.
06/17/20	S. Maizel	0.80	640.00	MED/DHCS	Analysis re DHCS audit issues and recoupment issues.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	S. Maizel	1.00	800.00	MED/DHCS	Review DHCS objection re sale of provider agreements and analyze same.
06/18/20	T. Moyron	1.60	958.80	MED/DHCS	Conference call with P. Chadwick, et al. re DHCS (.5); analyze P. Chadwick, et al. re same (.2); conference call with DHCS, R. Adcock, BRG, et al. (.9).
06/18/20	S. Maizel	1.50	1,200.00	MED/DHCS	Telephone conference with BRG, R. Adcock, etc. re briefing for DHCS on settlement proposal (.5); telephone conference with K. Wang, DHCS, R. Adcock, etc. re settlement proposal (1.0).
06/18/20	S. Maizel	0.50	400.00	MED/DHCS	Telephone conference with R. Adcock, etc. re DHCS issues (.2); telephone conference with BRG re DHCS issues (.2); email to Ken Wang re same (.1).
06/19/20	T. Moyron	0.30	179.78	MED/DHCS	Analyze correspondence related to stipulation re DHCS (.2); analyze K. Wang, et al., re briefing (.1).
06/19/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails re DHCS stipulation on briefing.
06/19/20	S. Maizel	0.40	320.00	MED/DHCS	Telephone conference with Ken Wang re provider agreement issues.
06/23/20	S. Maizel	0.60	480.00	MED/DHCS	Telephone conference with Ken Wang (X3) re DHCS settlement (.5); t/c w/ Peter Chadwick re same (.1).
06/23/20	S. Maizel	0.70	560.00	MED/DHCS	Review and respond to emails re DHCS settlement.
06/23/20	T. Moyron	0.40	239.70	MED/DHCS	Analyze proposed emails regarding DHCS settlement.
06/24/20	K.M. Howard	0.40	100.30	MED/DHCS	Analysis of Order Approving Stipulation Continuing Reply Deadline of DHCS' Objections to Transfer of Medi-Cal Provider Agreements and reviewed and revised Critical Dates Memorandum.
06/25/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails from Ken Wang re settlement terms.
06/29/20	T. Moyron	0.20	119.85	MED/DHCS	Analyze J. Schaland, et al., emails re QAF re DHCS (.2).
06/29/20	S. Maizel	1.00	800.00	MED/DHCS	Review and revise settlement for DHCS re provider agreement transfer.
<b>Subtotal</b>		<b>16.80</b>	<b>12,181.21</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2303161

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	31,200.07
B110	Case Administration	125.38
B130	Asset Disposition	21,180.45
B140	Relief from Stay/Adequate Protection Proceedings	10,435.78
B185	Assumption/Rejection of Leases and Contracts	2,032.80
B190	Other Contested Matters (excl. assumption/rejection motions)	10,026.73
B300	Claims and Plan	1,172.61
B310	Claims Administration and Objections	125.38
EMP	Employee matters	152,028.07
INS	Insurance	144.60
MED/CMS	Medicare/CMS Issues	4,170.68
MED/DHCS	Medi-Cal/DHCS Issues	12,181.21
Total This Matter		\$244,823.76

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	6.30	\$5,040.00
S. Alberts	\$800.00	89.70	\$71,760.00
S. Maizel	\$800.00	40.30	\$32,240.00
P. Maxcy	\$739.50	3.80	\$2,810.10
R. Garms	\$603.50	4.50	\$2,715.75
R. Richards	\$723.00	0.70	\$506.10
R. Westhoff	\$468.00	3.70	\$1,731.60
S. Libowsky	\$800.00	2.00	\$1,600.00
S. McCandless	\$799.00	1.20	\$958.80
T. Moyron	\$599.25	55.30	\$33,138.66
J.A. Moe, II	\$599.25	17.90	\$10,726.82

St. Francis Medical Center  
Invoice #: 2303161

July 29, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
L. Mihalich-Levin	\$701.25	0.90	\$631.13
K. Murphy	\$416.50	7.40	\$3,082.10
M. Zeefe	\$480.25	9.80	\$4,706.45
A. Shiran	\$514.50	0.50	\$257.25
C. Doherty, Jr.	\$374.00	108.40	\$40,541.60
G. Miller	\$442.00	6.00	\$2,652.00
N. Koffroth	\$501.50	37.70	\$18,906.55
I. Hsu	\$446.25	6.70	\$2,989.88
A. Dondoyano	\$323.00	5.70	\$1,841.10
D. Pina	\$318.75	1.40	\$446.25
G. Medina	\$293.25	5.90	\$1,730.18
K.M. Howard	\$250.75	<u>15.20</u>	<u>\$3,811.44</u>
Totals		431.00	\$244,823.76

Fee Total \$ 244,823.76

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Invoice Total \$ 244,823.76

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SNR Denton US LLP  
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Los Angeles, California 90017-5704Alston Hunt Floyd & Ing is now  
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dentons.com

Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303163**

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

Payment Due Upon Receipt

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Total This Invoice	\$ 46,902.25
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303163**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	T. Moyron	0.80	479.40	AGI	Analyze H. Levy-Biehl, et al., emails re response to S. Chan (.2); analyze letter to S. Chan re responses (.1); exchange emails with Cain re same (.2); analyze IOI (.2); prepare email to H. Levy-Biehl re same (.1).
06/18/20	T. Moyron	0.20	119.85	AGI	Analyze email from H. Levy-Biehl re Seton impact report (.1); prepare emails to 2005 and Committee advisors re same (.1).
06/25/20	T. Moyron	0.60	359.55	AGI	Analyze proposed letter to AG and prepare same (.3); correspond with H. Levy-Biehl re same (.1); analyze AHMC letter to AG (.1); analyze and prepare emails re same (.1).
	<b>Subtotal</b>	<b>1.60</b>	<b>958.80</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/08/20	S. Alberts	0.20	160.00	B130	Seton. Communicate with AHMC and co-counsel.
06/08/20	S. Maizel	0.40	320.00	B130	Review and respond to emails re employment by AHMC of Joe Badalian.
06/08/20	T. Moyron	0.30	179.78	B130	Analyze H. Levy-Biehl, AHMC emails re payor contracts and AG matters.
06/11/20	T. Moyron	0.20	119.85	B130	Analyze K. Skogstad, et al. emails re CBAs.
06/11/20	T. Moyron	0.30	179.78	B130	Analyze A. Ruda, et al. emails re AHMC re CBAs.
06/16/20	S. McCandless	0.40	319.60	B130	Communicate with T. Moyron and bankruptcy team regarding questions related to Newsom's COVID-19 order in context of Seton sale (.20); prepare information for same (.20).
06/17/20	N. Koffroth	3.70	1,855.55	B130	Draft omnibus stipulation re cure objections
06/18/20	N. Koffroth	3.20	1,604.80	B130	Draft letter re sale inquiry
06/18/20	K.M. Howard	0.40	100.30	B130	Analysis of order approving third omnibus stipulation continuing hearing and related deadlines and reviewed and revised Critical Dates Memorandum.
06/23/20	A. Dondoyano	0.10	32.30	B130	Review revised closing checklist from C. Johnson.
06/29/20	T. Moyron	0.10	59.93	B130	Analyze A. Ruda email re Seton status.
06/29/20	N. Koffroth	1.30	651.95	B130	Draft notice and schedules re AHMC designation of contracts
06/30/20	N. Koffroth	1.40	702.10	B130	Draft notice re AHMC designations (0.8); draft omnibus stipulation and related order continuing cure objections (0.6)
06/30/20	T. Moyron	0.20	119.85	B130	Correspond with E. Levy re stipulation re Seton and St. Francis stipulation (.1); correspond regarding filing of same (.1).
06/30/20	T. Moyron	0.40	239.70	B130	Analyze emails from M. Hung re designations and attachments (.2); analyze related correspondence (.2).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re contract with California over COVID patients.
06/30/20	S. Maizel	0.20	160.00	B130	Telephone conference with Ori Katz, etc. re Sunqwest contract issues.
06/30/20	T. Moyron	0.90	539.33	B130	Conference call with P. Chadwick re state and Seton services agreement (.2); conference call with S. Maizel re same (.2); analyze Seton services agreement (.1); prepare emails to H. Levy-Biehl, et al. re same (.2); analyze responses (.1); prepare email to counsel for the state (.1).
<b>Subtotal</b>		<b>13.90</b>	<b>7,504.82</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/18/20	J.A. Moe, II	0.10	59.93	B140	/Denise Greenwood v. Seton/ Review E-Mails on status of case, and E-Mail to Jeff Park and Elina Tilman on relief from stay.
	<b>Subtotal</b>	<b>0.10</b>	<b>59.93</b>		



Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	K.M. Howard	0.40	100.30	B185	Analysis of the Third Omnibus Stipulation continuing the hearing and applicable deadlines regarding cure objections and reviewed and revised Critical Dates Memorandum.
06/17/20	D. Cook	4.60	2,170.10	B185	Compose omnibus stipulation continuing cure deadlines regarding Seton facility (4.2); draft proposed order regarding same (.4);
06/18/20	N. Koffroth	0.60	300.90	B185	Draft stipulation continuing reply and hearing deadlines re QuadraMed and Picis cure objection
06/19/20	N. Koffroth	0.30	150.45	B185	Draft stipulation and order re Cigna cure objection
06/19/20	T. Moyron	0.40	239.70	B185	Conference call with O. Katz re counterparty cure issue and inquiry as to sale timing.
06/22/20	K.M. Howard	0.40	100.30	B185	Analysis of the stipulation between debtors and Quadramed to extend deadlines and continue hearing regarding cure objections and reviewed and revised Critical Dates Memorandum.
06/22/20	K.M. Howard	0.40	100.30	B185	Analysis of order approving stipulation between Debtors and Cigna to continue hearing and extend objection and reply deadlines and reviewed and revised Critical Dates Memorandum.
06/24/20	K.M. Howard	0.40	100.30	B185	Analysis of order approving stipulation continuing hearing and deadlines regarding Quadramed's objection to cure amounts and reviewed and revised Critical Dates Memorandum.
06/30/20	T. Moyron	0.30	179.78	B185	Conference call with O. Katz and S. Maizel re Sunquest (.2); prepare email to counsel for AHMC re same (.1).
<b>Subtotal</b>		<b>7.80</b>	<b>3,442.13</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	J.A. Moe, II	0.10	59.93	B190	/Antonio Sanchez v. Seton/ Review Cy Tabari's report on the events relating to Antonio Sanchez.
06/05/20	J.A. Moe, II	0.10	59.93	B190	/Reyes Hernandez v. Seton/ Review notice on upcoming Status Conference and exchange E-Mails with Karleen Murphy on actual Conference.
06/08/20	K. Murphy	0.20	83.30	B190	/ Reyes-Hernandez / Analyze court website to determine status of upcoming Status Conference re Bankruptcy on June 12, 2020 (.1); and analyze and respond to email from Cy Tabari re the same and draft email to Laurie Soledad to obtain copy of Status Conference Statement to forward to Mr. Tabari (.1).
06/08/20	J.A. Moe, II	0.10	59.93	B190	/Reyes Hernandez v. Seton/ Review with Karleen Murphy on proceeding with preparation for the Case Management Conference and transmittal of the Case Management Statement to Cy Tabari.
06/09/20	J.A. Moe, II	0.20	119.85	B190	/Reyes Hernandez v. St. Vincent/ Review E-Mails to and from Cy Tabari on now continued June 19th Case Management Conference and transmittal of the Statement to Mr. Tabari (and addition of Mr. Tabari to the Service List); review additional E-Mails confirming hearing on June 19th.
06/09/20	K. Murphy	0.20	83.30	B190	/ Reyes-Hernandez / Analyze email from the court clerk advising of the continuation of the June 12, 2020, Status Conference re Bankruptcy as continued to June 19th (.1); and draft email to Cy Tabari informing of the same and prepare update to Verity Litigation Upcoming Deadline Chart (.1).
06/09/20	K.M. Howard	0.40	100.30	B190	Analysis of the court's notice continuing the case conference review and reviewed and revised Litigation Management Chart accordingly.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	J.A. Moe, II	0.40	239.70	B190	/Susan Chow v. St. Vincent/ Review E-Mails exchanged with Andres Estrada, on fact that the Chows filed no Claims, and E-Mail to Mr. Estrada on whether they received the Notices (.20); exchange E-Mails with Andres Estrada on Notices received and question on scheduled Claims (.10); exchange E-Mails with Andres Estrada on Claim scheduled as disputed, and telephone cal with Karleen Murphy on possible defense to Litigation (.10).
06/16/20	K. Murphy	0.10	41.65	B190	/ Board of Pharmacy v. Seton / Draft email to Karen Chapman seeking clarification on case status.
06/17/20	K. Murphy	0.40	166.60	B190	/ Bonifacio / Analyze email from Elina Tilman enclosing Labor Code Request and respond to the same (.1); analyze request and add case information to Verity Charts (.2); and confer with Elina Tilman and John Moe re dates of Mr. Bonifacio's employment (.1).
06/18/20	K. Murphy	0.10	41.65	B190	/ Reyes-Hernandez / Analyze email from court clerk with Zoom call credentials for upcoming Status Conference re Bankruptcy.
06/18/20	K. Murphy	0.40	166.60	B190	/ Reyes-Hernandez / Analyze and respond to email from Plaintiff's counsel, Arnie Nelson, re upcoming status conference re bankruptcy (.1); telephone call with Mr. Nelson and John Moe re discussion of bankruptcy status (.1); and post call conference with John Moe to prepare for status conference on recent developments on bankruptcy case (.2).
06/18/20	J.A. Moe, II	0.30	179.78	B190	/Reyes Hernandez v. Seton/ Telephone conference with Karleen Murphy, and telephone call to Opposing Counsel Arnie Nelson (.10); telephone call with Karleen Murphy with Attorney Arnie Nelson on status of case and appearing on ZOOM Case Management Conference on June 19th (.20).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	K. Murphy	0.70	291.55	B190	/ Reyes-Hernandez / Prepare for attending Status Conference Statement re Bankruptcy by analyzing detailed report provided to court per order (.1); attend conference (.5); and prepare report to Verity Team and update to Verity Upcoming Deadline Chart (.1).
06/19/20	K. Murphy	0.10	41.65	B190	/Castro / Analyze and respond to email from John Moe re case status.
06/19/20	K. Murphy	0.10	41.65	B190	/Castro / Analyze emails from Karen Chapman, Cy Tabari, and Elspeth Paul re Seton's response to complaint based on erroneously naming of Seton in complaint.
06/19/20	J.A. Moe, II	0.10	59.93	B190	/Reyes Hernandez - Seton/ Review Karleen Murphy's report on her attendance at the hearing and confer with Ms. Murphy on Judge's comments on the Report prepared by Dentons.
06/19/20	J.A. Moe, II	0.10	59.93	B190	/ Ondina Castro v. Seton/ Review Cy Tabari's inquiry on defending the litigation, and E-Mail to Karleen Murphy on Ondina Castro and the Litigation Chart.
06/23/20	J.A. Moe, II	0.70	419.48	B190	/Oshioakpemeh Atogwe v. Seton/ Telephone call from Elina Tilman on background, whether the stay should be in place, and whether to draft a letter on the affect of the bankruptcy (.40); prepare draft of letter to Investigator Sylvia Knight on affect of the bankruptcy on proceeding with the investigation (.20); telephone call on address to which Notice Of Administrative Bar Date was sent (.10).
06/24/20	K. Murphy	0.30	124.95	B190	/ Sanchez / Analyze email from Karen Chapman enclosing wrongful death complaint and summons to Seton Medical Center and analyze complaint (.1); prepare updates to Verity Litigation Management Charts to change from notice of intent to case filing information (.1); and draft email to John Moe re case status re post petition matter (.1).
06/24/20	J.A. Moe, II	0.20	119.85	B190	Telephone call from Elina Tilman on responding to Sylvia Knight and necessity to transmit the Voluntary Petition.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	J.A. Moe, II	0.70	419.48	B190	/Oshioakpeme Atogwe/ Review E-Mails to Naomi Dulos on identifying address, and telephone call with Elina Tilman on researching address for Ms. Atogwe (.10); revise draft letter to Sylvia Knight on issues on recovery from Seton, researching background information to complete letter (.60).
06/25/20	J.A. Moe, II	1.00	599.25	B190	/Oshioakpeme Atogwe v. Seton/ Review and respond to E-Mails from Elina Tilman and Noemi Dulos on potential defense to the claim and letter to Sylvia Knight (.10); telephone call with Elina Tilman on letter to Sylvia Knight on bankruptcy issues (.10); revise letter to Ms. Knight and transmit to Ms. Tilman (.10); exchange additional E-Mails with Elina Tilman on letter, obtaining and transmitting the Voluntary Petition (.20); telephone call from, obtain and transmit to Ms. Tilman a conformed copy of the Petition (.10); telephone call with Elina Tilman, and review E-Mails from Andres Estrada, in regard to the address to which Notices were sent matching the address on Claim (.10); review and accept Elina Tilman's revisions to the proposed letter to Ms. Knight, and make additional revisions, and assemble Exhibits (.20); review final version of letter, make three corrections and transmit to Ms. Tilman, confer with Ms. Tilman on approval of letter (.10).
06/29/20	K. Murphy	0.20	83.30	B190	/ Castro / Analyze San Mateo Superior Court website for complaint to confirm date of incident, and download and analyze complaint (.1); and prepared updates to Verity Chart with corrected date of incident (.1).
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Vilma Sanchez v. Seton/ Exchange E-Mails with Karleen Murphy on analysis of the case and Cy Tabari's representation of Seton.
<b>Subtotal</b>		<b>7.30</b>	<b>3,723.47</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/18/20	K. Murphy	0.10	41.65	B300	/ Bonifacio / Analyze and respond to email from John Moe seeking dates of employment with SVMC and confer with Elina Tilman re obtaining the same.
06/18/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review letter from Counsel requesting preservation of records and E-Mail to Karleen Murphy on dates Mr. Bonafacio worked at Seton (.10); exchange E-Mails with Karleen Murphy and Karen Ackerman on dates of employment, and necessity to determine if tendered and coverage (.10).
06/19/20	K. Murphy	0.10	41.65	B300	/ Bonifacio / Confer with John Moe re obtaining necessary case information necessary for the Plan.
06/19/20	K. Murphy	0.10	41.65	B300	/ Bonifacio / Draft email to Luzann Fernandez seeking confirmation of settlement valuation figure as needed for information for the Plan.
06/19/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review with Karleen Murphy the Jeffrey Bonafacio v. Seton case; review E-Mail on tender to the Carrier.
<b>Subtotal</b>		<b>0.60</b>	<b>304.73</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/24/20	J.A. Moe, II	0.20	119.85	B320	Review the Objection to the Disclosure Statement filed by the Seton Medical Center Staff.
	<b>Subtotal</b>	<b>0.20</b>	<b>119.85</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	S. Alberts	0.40	320.00	EMP	Seton 1113 Confer with AHMC.
06/02/20	S. Alberts	0.20	160.00	EMP	Seton. Organize calendar of events in preparation of labor calls.
06/02/20	A. Shiran	2.80	1,440.60	EMP	
06/02/20	S. McCandless	1.70	1,358.30	EMP	
06/03/20	S. McCandless	0.50	399.50	EMP	
06/03/20	A. Shiran	0.80	411.60	EMP	
06/04/20	A. Shiran	0.80	411.60	EMP	
06/04/20	S. Alberts	0.40	320.00	EMP	Seton. Communications about 1113 discussions.




Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/04/20	S. McCandless	0.80	639.20	EMP	
06/09/20	T. Moyron	0.20	119.85	EMP	Conference call with AHMC re employment issue.
06/10/20	S. Alberts	0.40	320.00	EMP	Seton 1113. Communicate with A. Ruda regarding discussions between AHMC and four unions (.2); communicate with L. Odum to gather info (.2).
06/11/20	S. Alberts	5.80	4,640.00	EMP	Seton 1113. Draft and circulate form of letter to CNA regarding 1113 AHMC Proposal to use as model for other unions (1.0); receive comments and revise (.3); finalize letters for CNA, UNAC and Local 20 (.5); communicate with AHMC and A. Ruda in advance of calls with union (.7); confer with CNA (1.1); caucus (.1); communicate with NUHW (1.2); resume call with NUHW (.3); CW Local 20 (.6).
06/11/20	C. Doherty, Jr.	1.40	523.60	EMP	Provide comments to 1113 Proposal Letter (.7); research legal issues regarding 1113 process for SMC (.7)
06/12/20	S. Alberts	0.60	480.00	EMP	Seton 1113. Confer with AHMC and co-counsel (.3); other related union work in connection with Seton transaction (.3).
06/15/20	T. Moyron	0.20	119.85	EMP	Analyze A. Ruda, et al. correspondence re document requests.
06/15/20	S. Alberts	0.60	480.00	EMP	Seton. Draft CBA communication to Local 39 (.4) and follow up with BZBM (.2).

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/16/20	S. Alberts	2.80	2,240.00	EMP	Seton 1113. Labor call including 1113 process involving Seton (.5); follow up call with C. Doherty about need for 1113 motion preparation for Seton unions (.4); draft letter to Local 39 (.4) and obtain redline of CBA (.1); participate in Local 39 1113 meeting (including sending letter and CBA redline) (1.0) and follow up (.1); review of 1113 negotiations summaries (.3).
06/16/20	C. Doherty, Jr.	1.00	374.00	EMP	Prepare 1113 letter re 1113 proposal to unions .
06/17/20	S. Alberts	0.40	320.00	EMP	Seton. Receive from co-counsel, review and respond to AHMC and union negotiation updates (.3) and follow up request for daily summaries (.1).
06/18/20	S. Alberts	0.20	160.00	EMP	Seton. Communications concerning status of negotiations and information requests.
06/22/20	S. Alberts	0.30	240.00	EMP	Seton. Communicate with C. Doherty about Seton 1113 motion (.2); review status update from A. Ruda (.1).
06/23/20	C. Doherty, Jr.	3.30	1,234.20	EMP	Prepare Form of 1113 Motion
06/24/20	C. Doherty, Jr.	3.20	1,196.80	EMP	Prepare Form of 1113 Motion .
06/26/20	C. Doherty, Jr.	0.20	74.80	EMP	Call with BZBM regarding declarations for motion and regarding update on union negotiations.
06/29/20	T. Moyron	0.60	359.55	EMP	
06/29/20	S. McCandless	0.80	639.20	EMP	
06/29/20	S. Alberts	0.50	400.00	EMP	
					Seton 1113. Communications about status of closing (.2), pension plan treatment (.1) union negotiations and next steps (.2).

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
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06/30/20	T. Moyron	0.20	119.85	EMP	
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06/30/20	A. Shiran	4.10	2,109.45	EMP	
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06/30/20	S. Alberts	0.30	240.00	EMP	
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Seton Labor. Review status  
communications of various negotiations.

06/30/20	S. McCandless	3.90	3,116.10	EMP	
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<b>Subtotal</b>		<b>39.40</b>	<b>24,968.05</b>		
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Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/14/20	S. Maizel	0.50	400.00	MED/CMS	Revising CMS settlement.
06/17/20	K.M. Howard	0.40	100.30	MED/CMS	Analysis of the Stipulation extending Verity and DHHS deadlines and continuing the hearing regarding the transfer of Medicare Provider Agreements and reviewed and revised Critical Dates Memorandum.
06/18/20	K.M. Howard	0.40	100.30	MED/CMS	Analysis of order approving third stipulation continuing DHHS objection deadlines and the hearing and reviewed and revised Critical Dates Memorandum.
06/30/20	S. Maizel	0.50	400.00	MED/CMS	Revising CMS settlement agreement.
06/30/20	D. Cook	1.80	849.17	MED/CMS	Draft omnibus stipulation to continue cure objection deadlines(.7); draft stipulation to continue HHS cure objection deadlines (.5); analysis regarding assumption designation schedule (.6);
<b>Subtotal</b>		<b>3.60</b>	<b>1,849.77</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails re DHCS claims.
06/07/20	S. Maizel	0.70	560.00	MED/DHCS	Emails re DHCS settlement proposal re provider agreement.
06/14/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails re DHCS issues.
06/16/20	D. Cook	2.10	990.70	MED/DHCS	Draft omnibus stipulation regarding cure schedule (.9); draft stipulation regarding cure schedule concerning DHCS (.6); draft stipulation regarding cure schedule concerning HHS (.6);
06/17/20	S. Maizel	0.50	400.00	MED/DHCS	Review DHCS objection re sale of provider agreements and analyze same.
06/24/20	T. Moyron	0.20	119.85	MED/DHCS	Analyze K. Wang, et al. emails re DHCS.
06/24/20	K.M. Howard	0.40	100.30	MED/DHCS	Analysis of Order Approving Stipulation Continuing Reply Deadline of DHCS' Objections to Transfer of Medi-Cal Provider Agreements and reviewed and revised Critical Dates Memorandum.
06/24/20	S. Maizel	0.40	320.00	MED/DHCS	Review and respond to emails with K. Wang, P. Chadwick, etc. re terms of Seton settlement with DHCS.
06/29/20	S. Maizel	1.00	800.00	MED/DHCS	Review and revise settlement for DHCS re provider agreement transfer.
06/29/20	T. Moyron	0.20	119.85	MED/DHCS	Analyze H. Maanhuei, et al., emails re DHCS status and settlement.
06/30/20	S. Maizel	0.50	400.00	MED/DHCS	Review and respond to emails from AHMC re DHCS settlement.
<b>Subtotal</b>		<b>6.20</b>	<b>3,970.70</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2303163

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	958.80
B130	Asset Disposition	7,504.82
B140	Relief from Stay/Adequate Protection Proceedings	59.93
B185	Assumption/Rejection of Leases and Contracts	3,442.13
B190	Other Contested Matters (excl. assumption/rejection motions)	3,723.47
B300	Claims and Plan	304.73
B320	Plan and Disclosure Statement (incl. Business Plan)	119.85
EMP	Employee matters	24,968.05
MED/CMS	Medicare/CMS Issues	1,849.77
MED/DHCS	Medi-Cal/DHCS Issues	3,970.70
Total This Matter		\$46,902.25

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
S. Alberts	\$800.00	13.10	\$10,480.00
S. Maizel	\$800.00	5.10	\$4,080.00
S. McCandless	\$799.00	8.10	\$6,471.90
T. Moyron	\$599.25	6.30	\$3,775.30
J.A. Moe, II	\$599.25	4.70	\$2,816.53
K. Murphy	\$416.50	3.10	\$1,291.15
A. Shiran	\$514.50	8.50	\$4,373.25
C. Doherty, Jr.	\$374.00	9.10	\$3,403.40
N. Koffroth	\$501.50	10.50	\$5,265.75
A. Dondoyano	\$323.00	0.10	\$32.30
D. Cook	\$471.76	8.50	\$4,009.97

Seton Medical Center and Seton Coastsides  
Invoice #: 2303163

July 29, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Howard	\$250.75	<u>3.60</u>	<u>\$902.70</u>
Totals		80.70	\$46,902.25
Fee Total	\$	46,902.25	
Invoice Total	\$	<u>46,902.25</u>	

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303166**

Matter: 15800425-000014  
Seton Medical Center Foundation

Payment Due Upon Receipt

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Total This Invoice	\$ 2,618.44
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Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

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S. Maizel  
at 1 213 623 9300





Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303166**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000014  
Seton Medical Center Foundation

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	T. Moyron	0.20	119.85	AGI	Analyze H. Levy-Biehl, et al. emails re AG letter re charitable assets.
	<b>Subtotal</b>	<b>0.20</b>	<b>119.85</b>		

Seton Medical Center Foundation  
Matter: 15800425-000014  
Invoice No.: 2303166

July 29, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	T. Moyron	0.20	119.85	B130	Call with S. Maizel re VMC and funds (.1); analyze related emails (.1).
06/29/20	S. Maizel	0.60	480.00	B130	Telephone conference with Ralph Dickman re VMC Foundation issues (.4); review and respond to emails re same (.2).
	<b>Subtotal</b>	<b>0.80</b>	<b>599.85</b>		

Seton Medical Center Foundation  
Matter: 15800425-000014  
Invoice No.: 2303166

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	J.A. Moe, II	0.20	119.85	B190	/Oshioakpeneh Atogue v. Seton/ Review letter to be sent to Sylvia Knight, assemble Exhibits, and review creation of slip sheets; telephone call from and E-Mail to Elina Tilman on completing letter.
	<b>Subtotal</b>	<b>0.20</b>	<b>119.85</b>		

Seton Medical Center Foundation  
Matter: 15800425-000014  
Invoice No.: 2303166

July 29, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	T. Moyron	0.30	179.78	B320	Analyze plan provisions regarding charitable assets (.2); prepare email to R. Adcock, et al. re same (.1).
06/19/20	S. Maizel	0.20	160.00	B320	Telephone conference with M. St. James re charitable funds treatment in plan.
06/19/20	S. Maizel	0.40	320.00	B320	Review and respond to emails re charitable funds treatment in plan.
06/19/20	T. Moyron	0.90	539.33	B320	Conference call with M. St. James re POL and charitable assets (.3); exchange emails with P. Chadwick, et al. re same (.2); analyze chart re same (.1); analyze plan matters regarding same (.3).
06/23/20	S. Maizel	0.30	240.00	B320	Review and respond to emails re charitable foundation funds issues vis-à-vis plan confirmation.
06/24/20	S. Maizel	0.20	160.00	B320	Review and respond to email from M. St. James re disposition of charitable assets under the plan.
06/30/20	T. Moyron	0.30	179.78	B320	Correspond with R. Adcock, et al. re Foundations, distributions, etc. re Disclosure Statement (.2); analyze emails from J. Schlant, et al. re funds (.1).
<b>Subtotal</b>		<b>2.60</b>	<b>1,778.89</b>		

Seton Medical Center Foundation  
Matter: 15800425-000014  
Invoice No.: 2303166

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	119.85
B130	Asset Disposition	599.85
B190	Other Contested Matters (excl. assumption/rejection motions)	119.85
B320	Plan and Disclosure Statement (incl. Business Plan)	1,778.89
Total This Matter		\$2,618.44

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
S. Maizel	\$800.00	1.70	\$1,360.00
T. Moyron	\$599.25	1.90	\$1,138.59
J.A. Moe, II	\$599.25	0.20	<u>\$119.85</u>
Totals		3.80	\$2,618.44
Fee Total	\$	2,618.44	
Invoice Total	\$	<u>2,618.44</u>	

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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303164**

Matter: 15800425-000010  
Verity Medical Foundation

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Total This Invoice	\$ 8,697.24
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Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303164**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000010  
Verity Medical Foundation

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	P. Maxcy	1.00	739.50	B130	Review VMG emails and conference with H. Levy-Biehl re VMG winddown.
06/02/20	P. Maxcy	0.70	517.65	B130	Review and comment on VMG dissolution plan.
06/03/20	T. Moyron	0.50	299.63	B130	Conference call with H. Levy-Biehl, et al. re VMG (.3); analyze related emails (.2).
06/03/20	P. Maxcy	0.90	665.55	B130	Review materials and conference call with Verity advisors re VMG dissolution issues.
06/05/20	T. Moyron	0.50	299.63	B130	Conference call regarding VMG with E. Paul, H. Levy-Biehl, et al.
06/05/20	P. Maxcy	0.60	443.70	B130	Conference with Verity re VMG dissolution.
06/11/20	T. Moyron	0.20	119.85	B130	Analyze H. Levy-Biehl, et al., emails re VMG (.1); prepare email re same (.1).
06/11/20	P. Maxcy	0.50	369.75	B130	Consult with Verity re: VMG dissolution issues.
06/12/20	P. Maxcy	0.90	665.55	B130	Work on VMG release.
06/16/20	G. Miller	2.50	1,105.00	B130	Draft general release between VMF and VMG.
06/16/20	P. Maxcy	0.20	147.90	B130	Emails with VMG and others re status of dissolution.
06/17/20	T. Moyron	0.10	59.93	B130	Analyze P. Chadwick, et al., emails re VMG.
06/17/20	G. Miller	0.60	265.20	B130	Revise draft VMG release of claims against VMF.
06/17/20	P. Maxcy	0.60	443.70	B130	Revise and edit VMG release.
06/18/20	P. Maxcy	0.30	221.85	B130	Review proposed edits to release document.

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2303164

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/25/20	P. Maxcy	0.20	147.90	B130	Emails re status of VMG dissolution.
	<b>Subtotal</b>	<b>10.30</b>	<b>6,512.29</b>		



Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2303164

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	K. Murphy	0.10	41.65	B190	/ HEP Pharmacy / Analyze and respond to emails from John Moe re upcoming OSC re dismissal.
06/19/20	J.A. Moe, II	0.20	119.85	B190	/Alana Dahl v. Verity Medical Foundation/ Review Elina Tilman's E-Mail on multiple Motions set for upcoming court hearing, E-Mail to Ms. Tilman confirming the stay is in place, confer with Ms. Tilman on appearance at hearing, and E-Mail to Karleen Murphy on preparing a brief CMC Statement.
06/19/20	K. Murphy	0.30	124.95	B190	/ Dahl / Analyze and respond to emails from Elina Tilman and John Moe re upcoming status conference (.1); and analyze KFM prior summary of detailed minute order re case status to prepare for drafting status conference statement (.1); and draft status conference statement for John Moe's review. (.1).
06/20/20	K. Murphy	0.30	124.95	B190	/ Dahl / Analyzed emails from John Moe and Elina Tilman re upcoming case management conference and various other hearings re co-defendants on the same date (.1) analyze KFM prior procedural summary of the same and last CMC report (.1); and draft July 10, 2020 Case Management Conference Statement for John Moe and Elina Tilman's review (.1).
06/22/20	K. Murphy	0.30	124.95	B190	/ Dahl / Analyze and respond to emails from Elina Tilman and John Moe re required edits to Status Conference Statement (.1); and prepare revisions to finalize statement (.2).

Verity Medical Foundation  
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July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/22/20	J.A. Moe, II	0.50	299.63	B190	/Alana Dahl v. Verity Medical Foundation/ Telephone call from Karleen Murphy on Case Management Statement, then review proposed Statement and E-Mail on possible addition of dismissal, then review Ms. Murphy's proposed language for the Judicial Council Statement returned to Elina Tilman (.20); exchange E-Mails with Elina Tilman on possible language in Ms. Murphy's Statement (.10); review revised Statement -- through three iterations -- and recommend three sets of minor revisions, then review Statement to be filed (.20).
06/23/20	J.A. Moe, II	0.20	119.85	B190	/Angulo and Santiago v. Verity Medical Foundation/ Review the exchange of multiple E-Mails on postpetition claims and E-Mail to Elina Tilman on possible defense (.1); exchange E-Mails with Elina Tilman and Andres Estrada on Notices of the Case Commencement and Bar Dates sent to claimants (.1).
06/24/20	J.A. Moe, II	0.10	59.93	B190	Telephone call with Elina Tilman on status of Verity Medical Foundation and whether it has ceased operations; suggest and review exchange of E-Mails with Nick Koffroth and Ms. Tilman.
06/24/20	K. Murphy	0.10	41.65	B190	/HEP Pharmacy / Draft email to Laurie Murphy, litigation counsel for VMF, re outcome of OSC re settlement on 6/24/20.
06/24/20	K. Murphy	0.10	41.65	B190	/HEP Pharmacy / Analyze response email from Laurie Murphy, litigation counsel for VMF, re outcome of OSC re settlement on 6/24/20 and prepare update to Verity charts with continued OSC date.
06/24/20	K. Murphy	0.10	41.65	B190	/ Dahl / Analyze email from Elina Tilman with response to inquiry from insurance carrier requesting case update.
06/25/20	J.A. Moe, II	0.20	119.85	B190	/Alana Dahl v. Verity Medical Foundation/ Telephone calls with Karleen Murphy and Elina Tilman on apparent settlement of the Superior Court Case; E-Mail to Karleen Murphy on presumed settlement of the July 10th hearing; review E-Mail from Elina Tilman on telephone call with Luzann Fernandez on Alan Dahl on June 29th.

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2303164

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/29/20	J.A. Moe, II	0.20	119.85	B190	/Alana Dahl v. Verity Medical Foundation/ Exchange E-Mails with Karleen Murphy on continued hearing to October 7th, with settlement pending (.1); review E-Mail from David Harris on terms of a settlement, and note additional E-Mail on October 7th hearing as an OSC re dismissal (.1).
06/29/20	J.A. Moe, II	0.10	59.93	B190	/Verity Medical Foundation v. HEP Pharmacy/ Review Valensi Rose's analysis of the Litigation and settlement.
06/29/20	K. Murphy	0.30	124.95	B190	/ Dahl / Analyze Plaintiff's Notice of Conditional Settlement and Minute Order removing upcoming CMC and other motions off calendar and setting OSC re dismissal (.1); analyze and respond to emails from John Moe and Elina Tilman re the same (.1); and prepare updates to Verity Litigation Management Chart re case settlement and update to Verity Deadline Chart with OSC re dismissal date and date for Plaintiff to file Request for Dismissal of entire action (.1).
06/29/20	K. Murphy	0.10	41.65	B190	/ Dahl / Confer with Elina Tilman re conference call to discuss case status.
06/30/20	J.A. Moe, II	0.10	59.93	B190	/Alana Dahl v. Verity Medical Foundation/ Review E-Mail from Elina Tilman and telephone call from Karleen Murphy on scheduling conference on David Harris' proposed resolution.
06/30/20	J.A. Moe, II	0.10	59.93	B190	/Francisco Villarta/ Telephone call from Karleen Murphy discussing responding to Subpoena for records.
06/30/20	K. Murphy	0.30	124.95	B190	/CT Corporation - Francisco Villalta (SOAR) / Analyze email from Karen Chapman re no billing records for SOAR (.1); confer with John Moe re the same (.1); and draft response email to Karen Chapman with proposed plan for response (.1).

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2303164

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Francisco Villalta (SOAR) / Analyze notice from CT Corporation for medical record subpoena, and download and analyze subpoena (.1); and draft email to Verity Team re notice and instructions for production (.1).
	<b>Subtotal</b>	<b>3.90</b>	<b>1,935.05</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2303164

July 29, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	K. Murphy	0.30	124.95	B310	/ Santiago / Analyze new DLSE claim (.1); and emails from Elina Tilman and John Moe re status of proof of claims or administrative claims (.1); and prepare new case summary to add to Verity Litigation Management Chart. (.1).
06/23/20	K. Murphy	0.30	124.95	B310	/ Angula / Analyze new DLSE claim (.1); and emails from Elina Tilman and John Moe re status of proof of claims or administrative claims (.1); and prepare new case summary to add to Verity Litigation Management Chart. (.1).
<b>Subtotal</b>		<b>0.60</b>	<b>249.90</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2303164

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	6,512.29
B190	Other Contested Matters (excl. assumption/rejection motions)	1,935.05
B310	Claims Administration and Objections	249.90
Total This Matter		\$8,697.24

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
P. Maxcy	\$739.50	5.90	\$4,363.05
T. Moyron	\$599.25	1.30	\$779.04
J.A. Moe, II	\$599.25	1.70	\$1,018.75
K. Murphy	\$416.50	2.80	\$1,166.20
G. Miller	\$442.00	<u>3.10</u>	<u>\$1,370.20</u>
Totals		14.80	\$8,697.24
Fee Total		\$	8,697.24
Invoice Total		\$	<u>8,697.24</u>

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303170**

Matter: 15800425-000019  
Verity Holdings, LLC

Payment Due Upon Receipt

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\$ 24,021.50

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Reference Invoice # and/or client matter #

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Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303170**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000019  
Verity Holdings, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	C. Montgomery	0.10	80.00	B130	Master Lease communications with P Saba.
06/03/20	C. Montgomery	2.80	2,240.00	B130	Revise Master Lease agreement and communications with P Saba re same.
06/04/20	C. Montgomery	2.10	1,680.00	B130	Communications with T Moyron regarding NantWorks settlement (.1); develop additional background information and communications with L Macksoud regarding for NantWorks settlement stipulation and motion for approval under Rule 9019 (1.8); communications with J Schlant regarding additional background information (.1); communications with P Saba, P Chadwick and R Adcock re settlement sign off (.1)
06/05/20	C. Montgomery	0.20	160.00	B130	Phone call with L Macksoud regarding Master Lease stipulation.
06/05/20	L. Macksoud	3.70	1,619.68	B130	Call with C. Montgomery to discuss settlement agreement and 9019 motion relating to Verity Holdings and Nantworks (.5), review settlement term sheet (.8), review bankruptcy docket and asset sale motions and orders (1.1), commence drafting settlement agreement (1.3)
06/06/20	L. Macksoud	1.80	787.95	B130	Continue to draft Nantworks settlement agreement
06/07/20	C. Montgomery	0.20	160.00	B130	Review draft Master Lease settlement stipulation and communications with L Macksoud re same.



Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2303170

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/08/20	C. Montgomery	0.90	720.00	B130	Communications with L Macksoud regarding Master Lease revisions (.1); review and revise Master Lease Settlement Stipulation (.8)
06/08/20	L. Macksoud	2.10	919.28	B130	Review docket and update stipulation per comments from C. Montgomery
06/09/20	C. Montgomery	0.30	240.00	B130	Master Lease revisions and communications with L Macksoud re same.
06/10/20	C. Montgomery	0.10	80.00	B130	Continued revisions to Master Lease stipulation.
06/11/20	L. Macksoud	2.80	1,225.70	B130	Draft motion to approve settlement of Master Lease issue (1.8), draft declaration of R. Adcock in support of same (.6) and draft proposed order (.4)
06/11/20	C. Montgomery	1.00	800.00	B130	Continued revision of Master Lease stipulation.
06/15/20	C. Montgomery	3.00	2,400.00	B130	Continue revisions to Master Lease Settlement (2.9); communications with Macksoud re same (.1)
06/15/20	L. Macksoud	1.00	437.75	B130	Review comments to draft settlement agreement and further revise same (.8), confer with C. Montgomery and send to T. Moyron for review and comment (.2)
06/18/20	L. Macksoud	1.60	700.40	B130	Review comments to NantWorks settlement agreement (.6) and further draft motion to approve same (1.0)
06/18/20	C. Montgomery	0.30	240.00	B130	Communications with T Moyron, L Macksoud and P Saba regarding settlement stipulation resolving Master Lease issues.
06/18/20	S. Maizel	0.70	560.00	B130	Review and revise motion to approve Nantworks settlement.
06/19/20	T. Moyron	1.00	599.25	B130	Analyze internal correspondence regarding Nant equipment settlement (.2); analyze motion re same (.2); prepare comments to motion (.6).
06/19/20	C. Montgomery	1.10	880.00	B130	Communications with L Macksoud regarding Master Lease issues and further revisions to motion.

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2303170

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/19/20	L. Macksoud	4.70	2,057.43	B130	Further revise motion to approve NantWorks settlement per comments from T. Moyron, S. Maizel and C. Montgomery and confer with group re same (3.9), revise Adcock declaration per same (.8)
06/20/20	L. Macksoud	0.30	131.33	B130	Further revise motion to approve settlement (.2) and confer with C. Montgomery re same (.1).
06/22/20	L. Macksoud	1.80	787.95	B130	Further update and revise settlement motion (1.6), confer with C. Montgomery re same (.2)
06/22/20	C. Montgomery	2.20	1,760.00	B130	Follow up revisions to motion to approve Master Lease stipulation.
06/23/20	C. Montgomery	0.10	80.00	B130	Communications with T. Moyron and L. Macksoud regarding Master Lease settlement.
06/24/20	C. Montgomery	0.40	320.00	B130	Review Jones Day comments on Master Lease Settlement (.3):(communications with L Macksoud re same (.1)
06/24/20	L. Macksoud	0.40	175.10	B130	Review comments to settlement agreement provided by NantWorks
06/25/20	L. Macksoud	2.90	1,269.48	B130	Revise settlement agreement (.5) and motion to approve same (1.6) per comments from NantWorks, confer internally re same (.4) and draft email to client (.2) and NantWorks (.2) re same.
06/25/20	C. Montgomery	0.40	320.00	B130	Communications with L Macksoud re updated Master Lease agreement (.3); communications with T Moyron re same (.1)
06/26/20	C. Montgomery	0.10	80.00	B130	Communications with T Moyron and J Richlin regarding Master Lease Agreement.
06/29/20	C. Montgomery	0.20	160.00	B130	Participate in conference call with AHMC counsel and T Moyron, S Maizel regarding Master Lease equipment.
06/29/20	L. Macksoud	0.80	350.20	B130	Review NantWorks mark up to settlement agreement and motion (.4), review master lease per same (.3) and confer with C. Montgomery re same (.1).
<b>Subtotal</b>		<b>41.10</b>	<b>24,021.50</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2303170

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	24,021.50
	Total This Matter	\$24,021.50

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	15.50	\$12,400.00
S. Maizel	\$800.00	0.70	\$560.00
T. Moyron	\$599.25	1.00	\$599.25
L. Macksoud	\$437.75	<u>23.90</u>	<u>\$10,462.25</u>
Totals		41.10	\$24,021.50
Fee Total	\$	24,021.50	
Invoice Total	\$	<u>24,021.50</u>	

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2040 E. Mariposa Avenue  
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July 29, 2020

**Invoice No. 2303165**

Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

Payment Due Upon Receipt

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\$ 480.00

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S. Maizel  
at 1 213 623 9300



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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303165**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	C. Montgomery	0.30	240.00	B130	Communications with T Conner regarding Put Option Notice .
06/26/20	C. Montgomery	0.30	240.00	B130	Phone call with D Galfus regarding Priday buyout (.2); review prior correspondence re same (.1)
	<b>Subtotal</b>	<b>0.60</b>	<b>480.00</b>		

De Paul Ventures - San Jose Dialysis, LLC  
Matter: 15800425-000012  
Invoice No.: 2303165

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	480.00
	Total This Matter	\$480.00

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	<u>0.60</u>	<u>\$480.00</u>
Totals		0.60	\$480.00
Fee Total	\$	480.00	
Invoice Total	\$	<u>480.00</u>	

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USA

July 29, 2020

**Invoice No. 2303171**

Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

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at 1 213 623 9300



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El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303171**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	S. Martin	0.10	76.08	APP	Review order regarding SGM's request to brief vacatur issue.
06/02/20	K.M. Howard	0.40	100.30	APP	Analysis of Judge Fischer's order allowing Appellants to file a five-page reply to the Appellees' response re vacatur and reviewed and revised Critical Dates Memorandum accordingly.
06/05/20	K.M. Howard	0.30	75.23	APP	Analysis of the court's notice correcting Appellants deadline to file a five-page reply to the Appellees' response re vacatur and reviewed and revised Critical Dates Memorandum accordingly.
06/08/20	S. Martin	0.30	228.23	APP	Review and analyze reply filed by SGM in support of vacatur.
06/08/20	I. Hsu	0.10	44.63	APP	Review SGM reply to vacatur order.
06/08/20	C. Montgomery	0.30	240.00	APP	Communications with S Martin regarding SGM motion to dismiss (.1); [REDACTED]
06/08/20	T. Moyron	0.40	239.70	APP	Analyze SGM filing re vacatur (.2); call with S. Martin et al. re litigation (.2).
06/08/20	K.M. Howard	0.20	50.15	APP	Reviewed Reply filed by Appellant SGM (.1) and prepared email to Verity Team regarding same (.1).
06/08/20	N. Koffroth	0.20	100.30	APP	Participate in internal call re SGM litigation and appellate issues.
06/10/20	N. Koffroth	0.40	200.60	APP	Draft analysis of issues re vacatur



Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/10/20	S. Martin	1.20	912.90	APP	Review and analyze order vacating bankruptcy orders and related pleadings, confer with T. Moyron and S. Maizel regarding same.
06/10/20	T. Moyron	0.40	239.70	APP	Analyze District Court order (.1); conference call with S. Maizel and S. Martin re District Court order (.3).
06/11/20	T. Moyron	0.80	479.40	APP	Conference call with S. Martin et al. re vacatur order and related matters and next steps (.6); analyze emails from counsel for SGM, et al. (.2).
06/11/20	S. Maizel	0.60	480.00	APP	Telephone conference with Sonia Martin, etc. re district court ruling on vacating orders.
06/11/20	K.M. Howard	0.40	100.30	APP	Analysis of Judge Fischer's Orders (x3) vacating deadlines set by the court in consolidated appeal before the USDC and reviewed and revised Critical Dates Memorandum accordingly.
06/11/20	C. Montgomery	0.60	480.00	APP	Phone conference with S Martin, T Moyron, S Maizel regarding impact of District Court vacatur decision.
06/11/20	S. Martin	0.80	608.60	APP	Strategy call with debtors' counsel regarding vacatur order and appeal.
06/12/20	I. Hsu	3.00	1,338.75	APP	Draft memorandum on potential ninth circuit appeal.
06/12/20	C. Montgomery	0.50	400.00	APP	Communications with S Martin regarding proposed stipulation regarding delay of status conference and lifting stay, including review of law of the case decision in Ninth Circuit.
06/12/20	S. Martin	0.30	228.23	APP	Outline client memo regarding vacatur ruling.
06/14/20	S. Martin	0.70	532.53	APP	Draft memorandum regarding vacatur ruling.
06/14/20	I. Hsu	1.30	580.13	APP	Correspondence and edits to bullet points re potential vacatur order appeal.
06/14/20	C. Montgomery	0.70	560.00	APP	Communications with S Martin and T Moyron regarding appeal of vacatur order issues.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	T. Moyron	1.10	659.18	APP	Conference call with S. Martin, et al. re SGM matters and vacatur (1.0); exchange emails regarding call with Committee counsel (.1).
06/15/20	C. Montgomery	1.80	1,440.00	APP	Communications with T Moyron regarding vacatur issues (.1); participate in conference call with S Martin, T Moyron, I Hsu, S Maizel, N Koffroth regarding vacatur appeal issues (.9); follow up call with with S Martin and J Zeman regarding possible appeal of May 14 decision (.8)
06/15/20	T. Moyron	1.20	719.10	APP	Conference call with S. Martin, et al. re orders, vacatur and finality.
06/15/20	J.S. Zeman	0.80	438.60	APP	Analyzed multiple emails from Ms. Martin, Ms. Moyron, Ms. Hsu on issues relating to appealing Judge Fischer's adverse order on vacatur of the AG Order and possibly other orders
06/15/20	J.S. Zeman	1.20	657.90	APP	Conference calls with Mr. Maizel, Ms. Martin, Ms. Moyron, Mr. Montgomery regarding appellate issues of the vacatur order (.9) and appeal (.3).
06/15/20	J.S. Zeman	0.30	164.48	APP	Phone conference with Ms. Martin regarding evaluation of whether client should also appeal Order No.2 in addition to the vacatur order.
06/15/20	J.S. Zeman	1.70	932.03	APP	Researched question relating to finality of the May 14, 2020 Order to preserve standing and waiver arguments against SGM in the vacatur appeal.
06/15/20	T. Moyron	0.80	479.40	APP	Analyze matters related to DC vacature order and previous orders and appeal (.6); conference call with J. Zeman re same (.2).
06/15/20	T. Moyron	0.20	119.85	APP	Analyze brief in support of vacatur and related matters.
06/15/20	S. Martin	1.70	1,293.28	APP	Communicate with defense team regarding vacatur order.
06/15/20	I. Hsu	5.40	2,409.75	APP	Research ninth circuit standards on vacatur, waiver, and standing (4.1); draft notices of appeal for CD Cal and Ninth Circuit (1.3).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/15/20	I. Hsu	0.60	267.75	APP	
06/15/20	S. Maizel	1.00	800.00	APP	Telephone conference with S. Martin, etc. re SGM appeal issues.
06/15/20	S. Maizel	0.10	80.00	APP	Telephone conference with T. Moyron re SGM appeal issues.
06/15/20	S. Maizel	0.20	160.00	APP	Telephone conference with S. Martin re SGM appeal issues.
06/15/20	N. Koffroth	1.50	752.25	APP	Participate in internal conference calls analyzing issues re vacatur order x2 (0.2) (1.3)
06/16/20	J.S. Zeman	5.00	2,741.25	APP	Researched Standards of review of vacatur, standing and waiver at Ninth Circuit within context of appeal to adverse vacatur order
06/16/20	C. Montgomery	0.60	480.00	APP	Coimunications with S Martin and T Moyron re bullet points for client recommendation (.3); participate in conference call with M Shinderman, S Martin, T Moyron regarding vacatur issues (.3)
06/16/20	I. Hsu	3.00	1,338.75	APP	Research impact of vacatur and whether preclusive effect of underlying order is eliminated.
06/16/20	T. Moyron	1.00	599.25	APP	Analyze points regarding vacatur order and prepare the same (.2); exchange emails with S. Martin, et al., regarding same (.2); conference call with M. Shinderman, S. Martin, et al. re vacatur order (.6).
06/16/20	S. Martin	0.60	456.45	APP	Supplement memo regarding vacatur ruling (.3); confer with debtors' counsel and M. Shinderman regarding vacatur ruling (.3).
06/17/20	J.S. Zeman	3.10	1,699.58	APP	Researched standards of review for vacatur, standing, waiver/contract issues considered for appeal(2.2), and preparation of memorandum containing conclusions(.9)
06/17/20	S. Martin	0.90	684.68	APP	Communicate with debtors' counsel regarding vacatur order and prepare memo regarding same.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	K.M. Howard	0.40	100.30	APP	Analysis of the vacatur order and FRAP 4(a)(1)(A) regarding the deadline to file an appeal of the vacatur order entered 6/10/20 and reviewed and revised Critical Dates Memorandum.
06/17/20	I. Hsu	6.00	2,677.50	APP	Research and draft summary of vacatur in the Ninth Circuit.
06/18/20	I. Hsu	6.80	3,034.50	APP	Follow-up research and correspondence re vacatur.
06/18/20	J.S. Zeman	2.80	1,535.10	APP	Analyzed Ringsby, Bates, Bancorp line of cases for potential effectiveness in possible appeal of vacatur order(2.1); revised bullet/memorandum points(.7)
06/18/20	S. Martin	0.50	380.38	APP	Review and edit memo regarding vacatur ruling and communications regarding same.
06/18/20	T. Moyron	1.30	779.03	APP	Analyze case law discussion regarding standard of review and matters related to vacatur (.7); analyze proposed discussion and provide comments re vacatur (.4); analyze correspondence regarding same (.2).
06/19/20	J.S. Zeman	0.30	164.48	APP	Analyzed draft memorandum and proposed revisions.
06/19/20	S. Martin	0.30	228.23	APP	Attention to memo regarding vacatur order.
06/19/20	T. Moyron	1.70	1,018.73	APP	Analyze and prepare memorandum re vacatur and appeals (.9); analyze updated memorandum (.2); and conference calls with I. Hsu (.6).
06/19/20	J.S. Zeman	0.30	164.48	APP	
06/19/20	I. Hsu	3.70	1,651.13	APP	Draft and edit memorandum regarding vacatur appeal.
06/20/20	I. Hsu	3.10	1,383.38	APP	Follow up research and editing for vacatur memo.
06/21/20	S. Maizel	0.50	400.00	APP	Review and revise memo re vacatur of AG order.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
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July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/21/20	S. Martin	0.60	456.45	APP	Review and supplement memo regarding vacatur ruling and confer with debtors' counsel regarding same.
06/22/20	S. Martin	0.20	152.15	APP	Review comments to memo addressing vacatur ruling.
06/22/20	C. Montgomery	0.80	640.00	APP	Review S Martin memo to R Adcock regarding Vacatur appeal.
06/22/20	N. Koffroth	1.10	551.65	APP	Draft memorandum re vacatur order
06/22/20	I. Hsu	1.20	535.50	APP	Correspondence re vacatur memo.
06/22/20	T. Moyron	0.60	359.55	APP	Analyze and finalize memorandum (.5); exchange emails regarding same (.1).
06/23/20	I. Hsu	0.60	267.75	APP	Draft and edit notice of appeal.
06/23/20	T. Moyron	0.70	419.48	APP	Analyze SGM memo and finalize same (.3); correspond regarding same (.2); call with R. Adcock re SGM memo and next steps (.2).
06/23/20	S. Martin	0.30	228.23	APP	Finalize and circulate vacatur memo (.2); email from SGM regarding deposit (.1).
06/23/20	N. Koffroth	2.20	1,103.30	APP	Draft memorandum re issues related to vacatur
06/24/20	T. Moyron	0.60	359.55	APP	Analyze matters related to SGM's request re deposit (.2); prepare correspondence to Committee counsel, et al. re SGM (.2); analyze responses thereto (.2).
06/24/20	S. Martin	0.20	152.15	APP	Emails relating to treatment of Deposit in Plan and joint defense agreement.
06/24/20	C. Montgomery	0.50	400.00	APP	Communications with T Moyron, M Shindeman and S Martin regarding Klausner demand (.2); communications with T Moyron, S Martin and LWhidden regarding joint defense agreement (.3);
06/25/20	I. Hsu	1.20	535.50	APP	Correspondence and editing of notice to appeal.
06/26/20	S. Martin	0.20	152.15	APP	Review and comment on draft notice of appeal.
06/26/20	J.S. Zeman	0.30	164.48	APP	Developed further catch-all language for the Notice of Appeal of vacatur to include other rulings, orders, determinations etc. included within

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	J.S. Zeman	0.50	274.13	APP	Further analysis of scope of appeal as presented in Notice of Appeal.(.3). Drafted proposed alternative language to capture merged Order on Emergency Motion to Dismiss Appeal re AG Order (.2)
06/26/20	I. Hsu	0.70	312.38	APP	Correspondence and editing of notice of appeal.
06/29/20	S. Martin	0.10	76.08	APP	Review notice of appeal and email relating to same.
06/29/20	I. Hsu	0.90	401.63	APP	Correspondence and editing of notice to appeal.
06/30/20	T. Moyron	0.30	179.78	APP	Analyze final version of notice of appeal and attachments (.1); correspond with M. Shinderman re appeal (.1); correspond with J. Toma re appeal (.1).
<b>Subtotal</b>		<b>89.30</b>	<b>48,908.42</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/12/20	K.M. Howard	0.40	100.30	B110	Analysis of the court order granting joint stipulation to continue scheduling conference and reviewed and revised Critical Dates Memorandum accordingly.
	<b>Subtotal</b>	<b>0.40</b>	<b>100.30</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/02/20	I. Hsu	0.20	89.25	B130	Review scheduling order for deadlines related to scheduling conference.
06/04/20	I. Hsu	0.90	401.63	B130	Update Joint Rule 26(f) report and correspondence re report.
06/04/20	S. Martin	0.80	608.60	B130	Email with T. Moyron regarding status (.1); prepare joint scheduling report (.7).
06/05/20	S. Martin	0.80	608.60	B130	Draft initial disclosures (.3); [REDACTED]
06/05/20	N. Koffroth	0.40	200.60	B130	Participate in internal call re SGM litigation strategy.
06/05/20	I. Hsu	1.40	624.75	B130	Draft and edit Joint Rule 26(f) report and initial disclosures.
06/08/20	I. Hsu	0.60	267.75	B130	Edit Rule 26(f) Joint Report.
06/08/20	S. Maizel	0.40	320.00	B130	Telephone conference with Sonia Martin, etc. re pending issues.
06/08/20	S. Martin	0.20	152.15	B130	Strategy call with debtors' counsel regarding case management and motion issues.
06/08/20	S. Martin	0.60	456.45	B130	Prepare for and participate in strategy call regarding pleadings and case management (.3); draft and circulate initial disclosures and case management statement (.3).
06/10/20	S. Martin	0.70	532.53	B130	Review and edit Rule 26 statement, and confer with debtors and debtors' counsel regarding same.
06/10/20	C. Montgomery	2.30	1,840.00	B130	Communications with S Martin re Case management order and suggest revisions to joint 26(f) report (2.1); communications with S Martin, S Maizel and T Moyron regarding Defendants proposed stay extension (.2)
06/10/20	I. Hsu	1.50	669.38	B130	Edit Joint Rule 26(f) report and initial disclosures (.8); review appellate order re vacating bankruptcy orders (.7).



Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/11/20	T. Moyron	0.30	179.78	B130	Analyze redline stipulation re SGM and related emails (.2); prepare email re same (.1).
06/11/20	S. Martin	0.40	304.30	B130	Review and edit proposed stipulation regarding case management conference and communicate regarding same.
06/12/20	S. Martin	0.30	228.23	B130	Communications with debtors, debtors' counsel and SGM counsel regarding stipulation concerning case management conference.
06/14/20	S. Martin	0.10	76.08	B130	Review and calendar order continuing case management conference.
06/16/20	S. Maizel	0.60	480.00	B130	Telephone conference with M. Shinderman re district court ruling on vacating orders.
06/25/20	I. Hsu	1.70	758.63	B130	Draft joint defense agreement.
06/25/20	C. Montgomery	0.30	240.00	B130	Review of relevant joint defense agreements and communications with S Martin and T Moyron re same.
06/25/20	S. Martin	0.20	152.15	B130	Prepare joint defense agreement.
06/26/20	S. Martin	0.40	304.30	B130	Draft and circulate joint defense agreement.
<b>Subtotal</b>		<b>15.10</b>	<b>9,495.16</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2303171

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	48,908.42
B110	Case Administration	100.30
B130	Asset Disposition	9,495.16
Total This Matter		\$58,503.88

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	8.40	\$6,720.00
S. Maizel	\$800.00	3.40	\$2,720.00
S. Martin	\$760.75	13.50	\$10,270.19
J.S. Zeman	\$548.25	16.30	\$8,936.51
T. Moyron	\$599.25	11.40	\$6,831.48
N. Koffroth	\$501.50	5.80	\$2,908.70
I. Hsu	\$446.25	43.90	\$19,590.42
K.M. Howard	\$250.75	<u>2.10</u>	<u>\$526.58</u>
Totals		104.80	\$58,503.88

Fee Total \$ 58,503.88

Invoice Total \$ 58,503.88

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303172**

Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

Payment Due Upon Receipt

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Total This Invoice	\$ 50,305.61
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Chicago, IL 60604-6404

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ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

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Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

July 29, 2020

**Invoice No. 2303172**

For Professional Services Rendered through June 30, 2020:

Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	T. Moyron	0.40	239.70	B130	Analyze and prepare responses to questions from case manager re mediation (.1); coordinate further responses (.1); prepare email to R. Adcock, et al. re timing of pre-call re mediator (.1) and analyze responses (.1).
06/24/20	T. Moyron	0.70	419.48	B130	Conference call with ret. Judge Coar (mediator), CNA, R. Adcock, et al. pre-mediation call.
	<b>Subtotal</b>	<b>1.10</b>	<b>659.18</b>		

Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
06/01/20	S. Martin	0.10	76.08	B190	Email with clients and defense team regarding mediator selection.
06/01/20	S. Alberts	0.20	160.00	B190	SVMC CNA Litigation. Emails about mediation.
06/01/20	S. Maizel	0.40	320.00	B190	Telephone conference with R. Richards re potential mediator (.1); telephone conference with J. Baillie, re same (.1); office conference with T. Moyron re same (.2).
06/01/20	D. Cook	0.30	141.53	B190	Communications with A Youssefi regarding order continuing motion to withdraw the reference (.2); analysis regarding same (.1).
06/02/20	I. Hsu	0.20	89.25	B190	Review order granting stipulation to stay AP.
06/02/20	S. Alberts	0.10	80.00	B190	SVMC. Review mediation communication.
06/04/20	T. Moyron	0.90	539.33	B190	Conference call with N. Koffroth regarding CNA and mediation (.6); exchange emails with counsel for CNA re mediations (.2); send email to case manager for mediation (.1).
06/04/20	S. Martin	0.20	152.15	B190	Review and comment on email to mediator, email relating to same.
06/04/20	S. Alberts	0.10	80.00	B190	SVMC. Communications about mediation.
06/04/20	N. Koffroth	0.60	300.90	B190	Participate in call re stipulation and related mediation issues.
06/04/20	K.M. Howard	0.60	150.45	B190	Analysis of order approving stipulation to stay case pending mediation and the scheduling order and reviewed and reviewed Critical Dates Memorandum accordingly.
06/05/20	N. Koffroth	0.60	300.90	B190	Draft mediator questionnaire.
06/05/20	S. Martin	0.20	152.15	B190	Communications regarding mediation.

Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/05/20	T. Moyron	0.50	299.63	B190	Exchange emails with carrier (.1); exchange emails with counsel for CNA, case managers, et al. re mediation (.3); prepare email regarding information requested by case manager (.1).
06/05/20	A. Shiran	0.20	102.90	B190	Numerous internal correspondence regarding mediation.
06/08/20	N. Koffroth	1.00	501.50	B190	Draft response to mediator information request.
06/15/20	C. Montgomery	0.10	80.00	B190	Communications with T Moyron and N Koffroth regarding plaintiffs' disclosure inquiries.
06/16/20	S. Martin	0.20	152.15	B190	Review email from mediator's office regarding pre-mediation call.
06/16/20	S. McCandless	0.40	319.60	B190	Initial review of information received from Mediator.
06/17/20	T. Moyron	0.30	179.78	B190	Analyze zip file and draft response re mediation (.1); analyze email from counsel for CNA (.1); call with A. Yourssefi re response re mediation (.1).
06/17/20	A. Shiran	3.90	2,006.55	B190	Prepare responses to mediator's questions and prepare supporting documentation to be submitted and review related correspondence in connection with same (1.9); correspondence regarding supporting documents with David Cook (.3); discuss mediation and next steps with Sandy McCandless (.4); continue organization and assembly of all employee notices (.8); multiple correspondence with Tania Moyron regarding mediation (.2); correspondence with Sam Alberts and An Ruda regarding mediation and settlement history (.3).
06/17/20	S. Alberts	0.40	320.00	B190	SVMC. CNA litigation. Communicate about Mediation statement (.3) and mediation participation (.1).
06/17/20	S. Martin	0.20	152.15	B190	Review and respond to email regarding mediation.

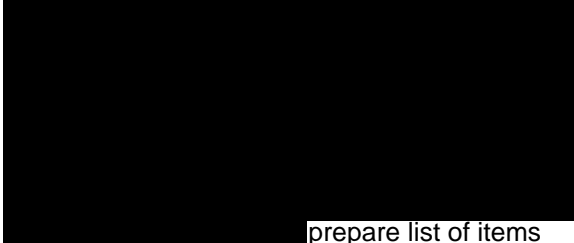


Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/17/20	S. McCandless	1.20	958.80	B190	Provide comments to A. Youssefi regarding response to Mediator's questions and related review of same (.50); review communications from S. Alberts and D. Cook regarding settlement history with CNA (.30); [REDACTED]
06/18/20	K.M. Howard	0.40	100.30	B190	Email exchanges with N. Koffroth regarding the pending mediation and reviewed and revised Critical Dates Memorandum accordingly.
06/18/20	A. Shiran	2.80	1,440.60	B190	Assist with preparation for mediation and prepare correspondence and supporting documentation to mediator (1.3); multiple correspondence regarding same with bankruptcy and labor team (.3) [REDACTED] discuss mediation questionnaire and supporting documentation with S. McCandless (.4).
06/18/20	S. McCandless	2.40	1,917.60	B190	[REDACTED] [REDACTED] review communications from Mediator (.30); communicate with bankruptcy team regarding submission to Mediator (.20); review union's response to mediator's questions (.30); work with A. Youssefi on mediation questionnaire for submission to mediator and supporting documentation (.40); [REDACTED]
06/19/20	T. Moyron	0.20	119.85	B190	Prepare emails regarding coordination of mediation brief and call and analyze related emails.
06/19/20	S. McCandless	0.60	479.40	B190	Communicate with T. Moyron regarding coordination of mediation brief (.20); related review of emails regarding mediation matters in preparation for same (.40).
06/19/20	S. Maizel	0.40	320.00	B190	Telephone conference with T. Moyron, etc. re CNA mediation brief.

Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/20/20	D. Cook	0.60	283.06	B190	
06/20/20	S. McCandless	3.90	3,116.10	B190	
					prepare list of items for consideration on team conference call to prepare for Mediation (.90); team conference call in preparation for drafting of Mediation Brief and Mediation (.60).
06/20/20	S. Martin	0.60	456.45	B190	
06/20/20	S. Alberts	0.60	480.00	B190	Verity. SFMC CNA Litigation. Confer with working group about mediation brief.
06/20/20	A. Shiran	0.20	102.90	B190	Multiple correspondence with S. McCandless regarding mediation.
06/20/20	S. Maizel	0.60	480.00	B190	Telephone conference with T. Moyron, etc. re CNA mediation brief.
06/22/20	A. Shiran	4.30	2,212.35	B190	Discuss organization and contents mediation brief with S. McCandless (.9); begin drafting mediation brief (2.2); conduct research in support of mediation brief (1.2)
06/22/20	S. McCandless	1.10	878.90	B190	Telephone call with A. Youssefi regarding organization and contents of Mediation Brief (.90); communicate with T. Moyron regarding nurses applying for unemployment (.20);
06/23/20	S. Alberts	0.40	320.00	B190	SVMC CNA Litigation. Review and comment on email with communication to insurer.
06/23/20	A. Shiran	5.60	2,881.20	B190	Draft mediation brief (4.1); discuss mediation brief with S. McCandless (.3); 
06/23/20	D. Cook	4.60	2,170.10	B190	Research regarding form of mediation brief (.6); review and analysis reagrding filed papers in bankruptcy and district court cases for mediation background (1.1); draft mediation statement factual background (2.9).



Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/23/20	S. McCandless	2.90	2,317.10	B190	Review CNA question regarding damages (.10); communicate with T. Moyron regarding same (.20); review Bartko letter to T. Knetts (.70); review S. Alberts' comments to same (.20); provide input to A. Youssefi for Mediation Brief (.60); discuss same with A. Youssefi (.30); review Motion to Withdraw Reference for same (.40); review related damages research (.40).
06/24/20	S. Martin	1.20	912.90	B190	Call with mediator and parties regarding mediation (.7); review and comment on exposure analysis (.5).
06/24/20	C. Montgomery	0.20	160.00	B190	Communications with T Moyron, S Alberts and S McCandless re insurance letter.
06/24/20	S. Alberts	2.00	1,600.00	B190	SVMC Mediation. Review comments to letter to insurer and respond (.2); receive and review letter and review changes and further comments (.3); confer with working group about upcoming call with mediator (.4); communicate with mediator (.8); discussion about mediator statement (.2) and follow up regarding mediation dates (.1).
06/24/20	S. Maizel	0.60	480.00	B190	Telephone conference with R. Adcock, etc. re CNA litigation.
06/24/20	S. Maizel	0.30	240.00	B190	Telephone conference with T. Moyron re CNA litigation.
06/24/20	D. Cook	2.90	1,368.10	B190	Draft mediation statement factual background (2.8); email communications with Dentons team regarding same (.1).
06/24/20	S. McCandless	7.30	5,832.70	B190	Further detailed review draft of Bartko letter (.40); review T. Moyron's comments to same (.30); comment to T. Moyron regarding same (.40); provide comments to Bartko team for additions/changes to letter (.50); related jury trial research for mention in letter (.40); conference call with R. Adcock, Dentons bankruptcy team, and A. Ruda to prepare for pre-mediation conference call with Judge Coar (.60); pre-mediation conference call with Judge Coar (.70); [REDACTED] communicate with T. Moyron

Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					regarding damages following same (.10); review further draft of Bartko letter (.30); provide additional comments to L. Fernandez for changes to same (.40); review further Bartko draft (.30); detailed review of first draft of mediation brief (.90); discuss additions and revisions to same with A. Youssefi (two calls) (1.30); team communications regarding change of mediation date (.10); revise A. Youssefi letter to Judge Coar enclosing case materials (.10); review T. Moyron's further changes to Bartko letter (.20).
06/24/20	A. Shiran	4.10	2,109.45	B190	Continue drafting mediation brief (1.3); Discuss brief w Sandy (1.3) numerous correspondence with bankruptcy team in preparation for mediation call (.3); attend pre mediation call with Judge Coar (.7) Discuss A. Ruda letter (.5)
06/24/20	T. Moyron	2.90	1,737.83	B190	Analyze BZBM letter re CNA litigation (.4); prepare correspondence regarding same (.2) and analyze replies (.2); call with R. Adcock re same (.2); [REDACTED] analyze L. Fernandez, et al., emails re letter (.3) and prepare email re same (.1); analyze and provide comments to letter (.6).
06/24/20	N. Koffroth	0.70	351.05	B190	Participate in call with R. Adcock, A. Ruda., et al. re mediation issues.
06/25/20	A. Shiran	4.40	2,263.80	B190	Draft mediation brief.
06/26/20	S. Martin	0.10	76.08	B190	Email with defense team regarding mediation.
06/26/20	A. Shiran	2.40	1,234.80	B190	Continue drafting mediation brief (2.2); numerous correspondence regarding resetting mediation date (.2)

Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
06/26/20	S. McCandless	3.00	2,397.00	B190	Review current version of Mediation Brief (.80); [REDACTED] [REDACTED] provide input to A. Youssefi for revisions and additions to same (.70); [REDACTED] [REDACTED]
06/27/20	S. Alberts	0.10	80.00	B190	SVMC CNA Lit. Communication about mediation.
06/28/20	S. Martin	0.70	532.53	B190	Prepare for and participate in call regarding deposit issues and email regarding same.
06/29/20	A. Shiran	0.20	102.90	B190	Further multiple correspondence regarding mediation status. (.2)
06/29/20	S. McCandless	0.20	159.80	B190	Communications with union counsel in preparation for mediation.
06/29/20	S. Martin	0.10	76.08	B190	Email relating to mediation.
06/30/20	S. McCandless	0.30	239.70	B190	[REDACTED]
<b>Subtotal</b>		<b>78.80</b>	<b>49,646.43</b>		

Adv. Proceeding - California Nurses association (CNA)  
Matter: 15800425-000021  
Invoice No.: 2303172

July 29, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	659.18
B190	Other Contested Matters (excl. assumption/rejection motions)	49,646.43
Total This Matter		\$50,305.61

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	0.30	\$240.00
S. Alberts	\$800.00	3.90	\$3,120.00
S. Maizel	\$800.00	2.30	\$1,840.00
S. Martin	\$760.75	3.60	\$2,738.72
S. McCandless	\$799.00	23.30	\$18,616.70
T. Moyron	\$599.25	5.90	\$3,535.60
A. Shiran	\$514.50	28.10	\$14,457.45
N. Koffroth	\$501.50	2.90	\$1,454.35
I. Hsu	\$446.25	0.20	\$89.25
D. Cook	\$471.76	8.40	\$3,962.79
K.M. Howard	\$250.75	<u>1.00</u>	<u>\$250.75</u>
Totals		79.90	\$50,305.61
Fee Total	\$	50,305.61	
Invoice Total	\$	<u>50,305.61</u>	

# Exhibit F

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Page 706 of 2038

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
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USA

August 30, 2020

**Invoice No. 2313107**

Matter: 15800425-000003  
Verity Health System of California

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Account # 0801051693  
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S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
 2040 E. Mariposa Avenue  
 El Segundo, CA 90245  
 USA

August 30, 2020

**Invoice No. 2313107**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000003  
 Verity Health System of California

**B100 - Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	M. Zeefe	1.80	864.45	B100	Review and circulate key dates for upcoming week to core team (0.8); reconcile with critical dates memorandum (0.6); call with K. Howard re same (0.4).
07/06/20	K.M. Howard	0.50	125.38	B100	Reviewed and revised Critical Dates Memorandum for the week of July 6th (.4); prepared email to Verity Team regarding same (.1).
07/06/20	K.M. Howard	0.20	50.15	B100	Email exchange with T. Moyron regarding the Critical Dates Memorandum (.1); prepared email to J. Moe regarding same (.1).
07/06/20	K.M. Howard	0.20	50.15	B100	Prepared email to A. Aguilar and C. O'Meara regarding upcoming hearings (.1); email exchanges regarding same (.1).
07/06/20	K.M. Howard	0.80	200.60	B100	Reviewed email from M. Zeefe regarding Critical Dates Memorandum (.1); reviewed Critical Dates and prepared response (.2); reviewed and revised Critical Dates (.4); prepared email to team regarding Critical Dates (.1).
07/07/20	M. Zeefe	0.20	96.05	B100	Emails re key dates.
07/08/20	M. Zeefe	0.10	48.03	B100	Emails with K. Howard re critical dates (0.1); update same (0.1).
07/08/20	T. Moyron	0.70	419.48	B100	Conference call with R. Adcock, BRG, et al. re status of plan, sales, etc.
07/08/20	N. Koffroth	0.70	351.05	B100	Participate in internal weekly team meeting.
07/08/20	S. Maizel	0.70	560.00	B100	Telephone conference with R. Adcock, H. Levy Biehl, BRG, etc. re pending issues.
07/09/20	S. Alberts	0.50	400.00	B100	Administration. Communicate with co-counsel regarding case status and work.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	S. Maizel	0.20	160.00	B100	Telephone conference with T. Moyron, Sam Alberts, etc. re pending issues.
07/09/20	S. Maizel	0.30	240.00	B100	Telephone conference with C. Montgomery re pending issues.
07/09/20	S. Maizel	0.20	160.00	B100	Telephone conference with T. Moyron re pending issues.
07/10/20	N. Koffroth	0.70	351.05	B100	Draft project workstreams memorandum
07/10/20	S. Alberts	0.30	240.00	B100	VHS Admin. Organize calendar and materials for filing.
07/13/20	K.M. Howard	0.60	150.45	B100	Revised and finalized Critical Dates Memorandum for week of July 13th (.5); prepared email to Verity Team (.1).
07/13/20	M. Zeefe	0.60	288.15	B100	Review key dates from upcoming week.
07/14/20	M. Zeefe	1.30	624.33	B100	Review critical dates memorandum and other filings and circulate key dates for upcoming week to core team.
07/15/20	N. Koffroth	0.80	401.20	B100	Participate in weekly internal team meeting with R. Adcock, P. Chadwick, et al.
07/17/20	S. Maizel	0.40	320.00	B100	Telephone conference with T. Moyron re pending issues.
07/20/20	N. Koffroth	1.60	802.40	B100	Draft memorandum re project workstreams.
07/20/20	M. Zeefe	3.00	1,440.75	B100	Review docket, calendar, and critical dates memorandum, and circulate key dates from upcoming week to core team.
07/22/20	S. Alberts	0.30	240.00	B100	Review all calendar items and cleared out inapplicable items.
07/23/20	S. Maizel	0.10	80.00	B100	Telephone conference with T. Moyron re pending issues.
07/23/20	S. Maizel	0.10	80.00	B100	Telephone conference with P. Chadwick, etc re pending issues.
07/27/20	T. Moyron	0.20	119.85	B100	Call with R. Adcock re sales and other matters.
07/27/20	S. Alberts	0.20	160.00	B100	Conference with S. Maizel about general case issues.
07/27/20	M. Zeefe	2.40	1,152.60	B100	Review docket and critical dates memorandum, and circulate key dates for upcoming week to core team (2.3); call with N. Koffroth re same (0.1).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	S. Alberts	0.30	240.00	B100	Review and clean up calendar invites and notes.
	<b>Subtotal</b>	<b>20.00</b>	<b>10,416.12</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	T. Moyron	1.40	838.95	B110	Analyze matters related to Sixth Motion to Reject (.2); analyze correspondence from B. McGrath re ASK (.2); analyze email from P. Saba re Integrity (.1); analyze correspondence from S. Warren re Services Agreement (.2); analyze email from P. Chadwick re labor matters (.1); analyze emails from M. Winston re Admin Claim Bar Date (.1); analyze Ty Connor email re insurance (.1); analyze H. Kevane et al., emails re overpayments (.2); correspondence with M. Shinderman, et al., re appeals (.2).
07/09/20	T. Moyron	0.90	539.33	B110	Internal Dentons call re case status, wind-up, and upcoming motions (.5); call with C. Montgomery re case matters and open issues (.4).
07/13/20	T. Moyron	0.90	539.33	B110	Conference call with R. Adcock re plan and sale matters.
07/14/20	T. Moyron	0.60	359.55	B110	Conference call with N. Koffroth re 1113 motions, mediation brief, and other case matters (.1), (.5).
07/15/20	T. Moyron	0.80	479.40	B110	Conference call with BRG, R. Adcock, et al. re plan, sale status, etc.
07/16/20	T. Moyron	0.70	419.48	B110	Conference call with 2005 advisors re sales, AG, plan.
07/17/20	T. Moyron	0.90	539.33	B110	Conference call with S. Maizel re sales, AG, and plan matters (.2), (.4); call with D. Galfus re Robles claimant litigation (.1); conference call with D. Galfus re wind down and case matters (.2).
07/25/20	T. Moyron	0.70	419.48	B110	Conference call with C. Whitmore and M. Preskeur re updates on plan, sales, etc.
07/28/20	G. Medina	1.90	557.18	B110	Communication with N. Koffroth and file ex parte motion for reconsideration (0.3); download efiled motion and send to team (0.2); review prepared Stipulation and file by Verity Health System of California, Inc. and NantWork, LLC's Extending Time To File Administrative Expense Claims In Respect of Master Equipment Lease and

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					upload order (0.5); download and send efiled to team (0.2); review prepared Stipulation and filed By Verity Health System of California, Inc. and U.S. Bank National Association, In Its Capacity as 2015 and 2017 Notes Trustee, and The MOB Lenders (0.5); download and send efiled to team (0.2);.
07/29/20	T. Moyron	0.20	119.85	B110	Analyze PCO report.
07/29/20	D. Pina	0.20	63.75	B110	Communications regarding court filings.
07/29/20	G. Medina	0.80	234.60	B110	Work on calling court call regarding hearing and re-sending confirmations for telephonic appearances for the Client, BRG and Dentons.
07/30/20	T. Moyron	1.10	659.18	B110	Conference call with R. Adcock re sale and plan matters (.3); call with P. Chadwick re same (.2); additional call with P. Chadwick re same (.2); call with D. Bleck re sale matters (.4).
<b>Subtotal</b>		<b>11.10</b>	<b>5,769.41</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B120 - Asset Analysis and Recovery**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/03/20	T. Moyron	0.40	239.70	B120	Analyze Milbank email re Integrity (.1) and analyze related matters (.2); analyze S. Warren email re services agreement (.1).
07/06/20	C. Montgomery	1.10	880.00	B120	Communications with T Moyron and N Koffroth re Integrity memo (.9); phone call with T Moyron re joint interest privilege (.2)
07/07/20	S. Maizel	0.30	240.00	B120	Telephone conference with C. Montgomery and T. Moyron re Integrity claim issues.
07/09/20	C. Montgomery	1.00	800.00	B120	Communications with T Moyron regarding Blue Mountain presentation and review of same (.8) ; communications with T Moyron regarding prior Integrity Analysis (.2)
07/14/20	C. Montgomery	0.10	80.00	B120	Communications with R Liubicic regarding communications with Jones Day regarding claims and defenses to Integrity.
07/15/20	C. Montgomery	0.10	80.00	B120	Communications with S Maizel and T Moyron regarding Integrity settlement.
07/16/20	C. Montgomery	0.70	560.00	B120	Communications with R Liubicic, T Moyron , D Bleck regarding Integrity settlement (.1); participate in phone conference with R Liubicic, T Moyron , D Bleck re same (.3) ; follow up call with T Moyron (.3)
07/17/20	T. Moyron	0.50	299.63	B120	Conference call with R. Adcock, BRG, et al. re Integrity (.3); conference call with R. Adcock re Integrity (.2).
07/17/20	C. Montgomery	0.50	400.00	B120	Participate in phone conference with R Adcock, T Moyron and D Galfus regarding Committee's Integrity proposal (.3); follow up call with T Moyron (.2)
07/23/20	T. Moyron	0.70	419.48	B120	Conference call with Milbank, R. Adcock, C. Montgomery, et al. re Integrity (.4); conference call with M. Shinderman re same (.3).
07/23/20	C. Montgomery	0.80	640.00	B120	Phone call with T Moyron and R Adcock regarding Committee approach to Integrity settlement (.4) ; participate in phone conference with am Shinderman, R Liubicic , R Adcock, T Moyron, regarding approach to Integrity settlement (.4)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
	<b>Subtotal</b>	<b>6.20</b>	<b>4,638.81</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	T. Moyron	0.50	299.63	B130	Conference call with H. Kevane, R. Adcock, et al. regarding issues related to payors and overpayments.
07/06/20	T. Moyron	0.30	179.78	B130	Conference call with D. Bleck re status of sales and related matters.
07/08/20	P. Maxcy	0.30	221.85	B130	Conference N. Haslun and P. Chadwick re disposition of SourceHOV contract.
07/08/20	P. Maxcy	0.80	591.60	B130	Review information re SourceHOV contracts in order to discuss with SVMd.
07/09/20	T. Moyron	0.70	419.48	B130	Conference call with P. Chadwick, H. Levy-Biehl et al. re IMA, TMA.
07/16/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re sale issues.
07/22/20	C. Montgomery	0.70	560.00	B130	Verity internal conference call re Prime and AHMC conference call.
07/24/20	N. Koffroth	0.50	250.75	B130	Participate in internal checklist call re sale status.
07/24/20	T. Moyron	0.50	299.63	B130	Call with R. Adcock, H. Levy-Biehl, et al. re closing checklist.
07/24/20	C. Montgomery	0.40	320.00	B130	Participate in Verity Internal call regarding Prime and AHMC sales.
07/26/20	R. Richards	0.50	361.50	B130	Revise and circulate Liquidating Trust Agreement and confirm plan cross reference additions from Mintz.
07/27/20	T. Moyron	0.30	179.78	B130	Conference call with Verity, BRG, Cain, et al. re closing checklist.
07/27/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, BRG, etc. re pending sales issues.
07/27/20	C. Montgomery	0.80	640.00	B130	Participate Verity internal conference call re Prime and AHMC closings.
07/27/20	N. Koffroth	0.40	200.60	B130	Participate in internal call with R. Adcock, P. Chadwick, et al. re issues related to sale closing.
07/28/20	M. Zeefe	2.00	960.50	B130	Research reconsideration of order (1.6); calls with T. Moyron re same (0.4).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	G. Medina	0.80	234.60	B130	Communication with M. Welch regarding bring-down UCC and lien searches as of a current date (0.2); review prior emails regarding past requests to CSC (0.3); request updated lien searches from CSC and send prior request as reference (0.3).
07/28/20	T. Moyron	1.90	1,138.58	B130	Analyze P. Chadwick , et al. correspondence (.4); analyze SGN Admin Claim and related emails (.3); analyze N. Anderson email and related OR issues (.4); analyze correspondence from ASK LLC and related (.2); analyze matters related to CAN settlement (.2); analyze matters related to AppleCare (.2); analyze emails from T. Sada and attachments re claim extension and equipment lease (.2).
07/29/20	T. Moyron	0.20	119.85	B130	Analyze emails from N. Nguyen, et al. re closing checklist matters.
07/29/20	T. Moyron	0.40	239.70	B130	Conference call with BRG, Verity, et al. re Verity team internal closing checklist.
07/29/20	S. Maizel	0.40	320.00	B130	Telephone conference with BRG, R. Adcock, etc. re sales related issues.
07/29/20	N. Koffroth	0.30	150.45	B130	Participate in internal closing checklist call
07/29/20	C. Montgomery	0.30	240.00	B130	Participate in Verity team call regarding sale closings.
07/30/20	S. Maizel	1.00	800.00	B130	Telephone conference with Mintz, etc. re sale issues.
07/30/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re sale issues.
07/30/20	R. Richards	0.20	144.60	B130	Follow up on private sale bid status.
07/30/20	G. Medina	0.40	117.30	B130	Team Call with Dentons, BRG and Client regarding closing materials and lien searches.
07/31/20	G. Medina	0.30	87.98	B130	Review updated UCC lien searches and send to M. Welch and team.
07/31/20	T. Moyron	0.40	239.70	B130	Analyze matters related to Cigna designation.
07/31/20	N. Koffroth	0.40	200.60	B130	Participate in call with R. Adcock, P. Chadwick, et al. re sale issues and closing checklist

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	C. Montgomery	0.30	240.00	B130	Participates in Verity Internal conference call re closing items.
	<b>Subtotal</b>	<b>16.70</b>	<b>10,318.46</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	J.A. Moe, II	0.20	119.85	B140	/Mariabelen Basulto/ Exchange E-Mails with, review executed Stipulation on, and telephone call from Nicole Podgurski on relief from stay.
07/27/20	K.M. Howard	0.20	50.15	B140	Reviewed docket to determine if orders were issued in June 2020 concerning relief from stay (.1); prepared email to N. Haslun (.1).
	<b>Subtotal</b>	<b>0.40</b>	<b>170.00</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B150 - Meetings of and Communications with Creditors**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	A. Ruegger	1.30	1,040.00	B150	Review prior communications and productions to UCC for completion of Blue Mountain and Integrity productions.
07/02/20	A. Ruegger	1.40	1,120.00	B150	Review documents from client re: Blue Mountain and Integrity for production to UCC.
07/06/20	A. Ruegger	0.90	720.00	B150	Communications with T. Moyron, S. Maizel, N. Koffroth and G. Medina re; proposed production to UCC re: Blue Mountain and Integrity.
07/06/20	T. Moyron	1.20	719.10	B150	Analyze Integrity and BlueMountain documents (.6); prepare correspondence to R. Adcock re same and review responses (.2); analyze memo regarding claims and provide comments (.4).
07/06/20	T. Moyron	1.30	779.03	B150	Conference call with C. Montgomery re documents to be transmitted to Committee and Joint Interest Agreement (.3); call with N. Koffroth re same (.5), (.2); prepare correspondence to BRG re valuation requested by Committee (.1); prepare emails to Committee counsel re documents and Joint Interest Agreement and review responses (.2).
07/06/20	G. Medina	0.60	175.95	B150	Review communications with A. Ruegger regarding redacting confidential information and committee production (0.4); review excel related to management and other fees send T. Moyron Integrity/blue mountain documents (0.2).
07/06/20	N. Koffroth	1.00	501.50	B150	Conference call with C. Montgomery re documents to be transmitted to Committee and Joint Interest Agreement (.3); calls with T. Moyron re same (.5), (.2)
07/07/20	S. Maizel	0.30	240.00	B150	Telephone conference with Fresenius counsel re issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	T. Moyron	0.40	239.70	B150	Conference call with J. Schlant re Committee document request (.1); exchange emails re same (.1); follow-up call with J. Schlant re same (.1); prepare email to Committee counsel (.1).
07/18/20	G. Medina	2.50	733.13	B150	Review collection of emails and documents related to prior document requests from UCC (1.7); call with T. Moyron regarding conference call with Milbank and prior requests (0.2); Conf call with Milbank and Dentons team regarding new document requests versus old request and work stream (0.6).
07/18/20	A. Ruegger	1.40	1,120.00	B150	Communications with T. Moyron, G. Medina and Milbank team re Milbank document requests (0.6); review Milbank revised document requests (0.1); review 2018 and 2019 Milbank document requests (0.7).
07/19/20	A. Ruegger	0.50	400.00	B150	Communications with T. Moyron, N. Koffroth and client re Milbank document requests and potentially responsive documents.
07/19/20	N. Koffroth	1.80	902.70	B150	Draft responses to information requests by Committee re determination motions
07/20/20	A. Ruegger	0.20	160.00	B150	Communications with T. Moyron, N. Koffroth and client re production to Milbank.
07/22/20	S. Maizel	0.30	240.00	B150	Telephone conference with Jade Medical Group re payments.
07/23/20	S. Maizel	0.50	400.00	B150	Telephone conference with P. Chadwick re Swinerton issues (.2); telephone conference with R. Amkraut re Swinerton (.3).
<b>Subtotal</b>		<b>15.60</b>	<b>9,491.11</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B160 - Fee/Employment Applications**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K.M. Howard	0.30	75.23	B160	Reviewed email from K. Duffy of Bartko regarding Monthly Fee Application (.1); reviewed Bartko's fee application (.1); prepared email to K. Duffy regarding same (.1).
07/01/20	K.M. Howard	1.10	275.83	B160	Prepared email to C. Montgomery regarding the interim fee application (.1) reviewed Dentons' billing statements for January-April 2020 and assembled requested information (.6); prepared email to C. Montgomery (.1); reviewed followup email from C. Montgomery requesting additional information (.1); assembled documents and prepared email to C. Montgomery (.2).
07/01/20	K.M. Howard	0.20	50.15	B160	Reviewed email from T. Geher of Jeffer Mangels regarding interim fee application (.1); conferred with J. Moe regarding same (.1).
07/01/20	K.M. Howard	1.60	401.20	B160	Reviewed Dentons' billing statements for May 2020 and prepare summary of hours and fees by timekeeper.
07/01/20	J.A. Moe, II	0.20	119.85	B160	/BZBM/ Telephone call with and review proposed Fourth Interim Fee Application to be filed by the Bartko Law Firm, and E-Mail to Kathryn Howard on review and approval of the Application.
07/01/20	J.A. Moe, II	0.10	59.93	B160	/ASK LLP/ Review exchange of E-Mails and sample Application For Employment, for ASK LLP.
07/01/20	S. McCandless	0.60	479.40	B160	Telephone call with J. Moe regarding Fifth Fee Interim Application (.30); instructions to A. Youssefi for drafting of same (.30).
07/01/20	C. Montgomery	0.90	720.00	B160	Communications with J Moe and K Howard regarding interim fee application preparation (.1); draft same (.8)
07/01/20	A. Shiran	1.80	926.10	B160	Draft inserts to fee motion.
07/02/20	A. Shiran	0.90	463.05	B160	Draft fee motion and evaluate information relating to same (.4) discuss same with S. McCandless (.5).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	S. McCandless	0.90	719.10	B160	Review first draft of labor section of Fifth Fee Interim Application in context of work done (.50); instructions to A. Youssefi regarding additions and revisions to same (.40).
07/02/20	J.A. Moe, II	0.20	119.85	B160	/ASK LLC/ Review draft and format proposed Declaration to be filed in support of the Application to employ ASK, LLC.
07/02/20	J.A. Moe, II	0.30	179.78	B160	/Dentons' Fifth Interim Fee Application/ Telephone call returned from Sandra McCandless on reviewing work performed between January and April, and Ms. McCandless and Anna Youssefi preparing a description of work performed on labor related issues for the Fee Application.
07/02/20	C. Montgomery	0.50	400.00	B160	Communications with P Chadwick regarding ASK retention.
07/05/20	S. McCandless	1.40	1,118.60	B160	Draft/supplement sections of 5th Fee Application regarding employee-related matters and issues in connection with emergency closure of St. Vincent due to SGM's failure to complete sale and employee-related matters and anticipated terminations at Seton and St. Francis (.60); review 5th Fee Application period for drafting of detailed description of same (.80).
07/06/20	C. Montgomery	0.80	640.00	B160	Communications with M Shinderman regarding ASK retention (.1) ;Communications with T Moyron, P Chadwick, regarding ASK retention (.7)
07/06/20	A. Shiran	0.50	257.25	B160	Finalize and update insert for 5th fee application ( .2)
07/06/20	J.A. Moe, II	0.20	119.85	B160	/Ordinary Course Professionals/ Review the updated version of the pleading and preparation of pleading to be filed.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	S. McCandless	1.60	1,278.40	B160	Continued drafting and revision of portion of 5th Interim Fee Application regarding employee-related matters and issues in connection with emergency closure of St. Vincent due to SGM's failure to complete the sale and employee-related matters and anticipated terminations at Seton and St. Francis (1.30); telephone call with A. Youssefi regarding same (.30).
07/06/20	J.A. Moe, II	0.20	119.85	B160	/ASK LLC/ Review and respond to E-Mail from Joseph Steinfeld, on Application For Employment and review form of Employment Application.
07/06/20	K.M. Howard	3.30	827.48	B160	Reviewed Dentons' billing statements for May 2020 and prepared Summary of Hours and Fees for Dentons' Timekeepers (1.3); prepared Summary of Time, Fees and Expenses for each Debtor (1.2); prepared Dentons' Monthly Fee Application for May 2020 (.8).
07/06/20	K.M. Howard	0.20	50.15	B160	Email exchange with T. Geher regarding Jeffer Mangels' interim fee application and notice.
07/07/20	J.A. Moe, II	0.10	59.93	B160	/ASK LLC/ Exchange E-Mails with Joseph Steinfeld and identify and review Notices utilized in noticing the DWT and BZBM Employment Applications.
07/07/20	J.A. Moe, II	0.60	359.55	B160	/Dentons Fifth Interim Fee Application/ Telephone call and E-Mail to Sam Alberts, and E-Mail to Nick Koffroth, on completing the sections of the Fee Application (.30); exchange E-Mails with Sam Alberts, locate descriptions on KIEP/KERP and the CNA Litigation, and forward to Mr. Alberts (.30).
07/07/20	S. Alberts	0.20	160.00	B160	VHS Fees. Communicate with J. Moe concerning fee application inserts.
07/07/20	N. Koffroth	2.30	1,153.45	B160	Draft interim fee application
07/07/20	K.M. Howard	2.60	651.95	B160	Reviewed and revised Dentons' Monthly Fee Application for May 2020 (.2); reviewed and Dentons' billing statements for May 2020 for all debtors and redacted privileged information (2.3); prepared email to S. Maizel and T. Moyron (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/20	K.M. Howard	2.80	702.10	B160	Reviewed Dentons' billing statements from January - April 2020 and worked on preparing spreadsheet of professionals' hours and fees.
07/08/20	J.A. Moe, II	0.30	179.78	B160	/Dentons Fifth Interim Fee Application/ Identify sections of the latest Disclosure Statement, and transmit to Sam Alberts for use in preparing descriptions of services (.20); telephone call with Mr. Alberts on two sections for the Fee Application (.10).
07/08/20	J.A. Moe, II	1.30	779.03	B160	/ASK LLC/ Complete first draft of Application For Employment and Declaration Of Joseph Steinfeld, including telephone call with Mr. Steinfeld on information in the Application (1.10); review preparation of the Employment Application and new terms in letter (.20).
07/08/20	J.A. Moe, II	0.10	59.93	B160	Telephone call from Shirley Cho on filing of Monthly and Interim Fee Applications.
07/08/20	C. Montgomery	0.10	80.00	B160	Communications with B. McGrath and T. Moyron regarding ASK retention.
07/09/20	C. Montgomery	0.30	240.00	B160	Communications with P Chadwick and M Shinderman regarding ASK retentions.
07/09/20	K.M. Howard	3.20	802.40	B160	Analysis of Dentons' billing statements from January - April 2020 and further preparation of spreadsheet of professionals' hours and fees, and preparation of spreadsheet regarding fees and hours by Debtor.
07/09/20	J.A. Moe, II	0.30	179.78	B160	/Denton's June Monthly Fee Application/ Preliminarily review the first set of Statements, and prepare for review and revisions in accordance with the U.S. Trustee Guidelines.
07/09/20	J.A. Moe, II	0.20	119.85	B160	/Denton's Fifth Interim Fee Application/ Assemble inserts on two sections of the Fee Application (.10); telephone call to Nick Koffroth on multiple sections of the Fee Application (.10).
07/09/20	J.A. Moe, II	1.40	838.95	B160	/ASK LLC/ Revise the first complete draft of the Application For Employment of ASK LLC and the accompanying Declaration Of Joseph L. Steinfeld.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	S. Alberts	0.40	320.00	B160	Fee. Review and revise insert for fee application and send to J. Moe.
07/09/20	N. Koffroth	0.80	401.20	B160	Draft interim fee application
07/10/20	N. Koffroth	4.20	2,106.30	B160	Draft portions of fifth interim fee application.
07/10/20	K.M. Howard	4.20	1,053.15	B160	Reviewed Dentons' billing statements from January - April 2020 and further preparation of spreadsheets of professionals' hours and fees (1.9); prepared spreadsheets of project categories by Debtors (2.3).
07/10/20	J.A. Moe, II	0.10	59.93	B160	/BZBM/ E-Mail and telephone call from Kerry Duffy on Interim Application For Fees And Reimbursement Of Expenses.
07/10/20	J.A. Moe, II	0.10	59.93	B160	/ASK LLC/ Review latest draft of the Application For Employment and the Notice of Application.
07/10/20	J.A. Moe, II	2.20	1,318.35	B160	/ASK LLC/ Review and make minor corrections to the Application For Employment (.30); completely revise the Declaration Of Joseph Steinfeld (.60); telephone call to Joseph Steinfeld on insert for the Application and Resumes to attach to the Application (.10); revise and expand the Notice Of Employment Application (.30); further revisions to the Application and Declaration, conforming for citations to be added (.60); minor revisions to the Notice Of Application (.20); review process of inserts on Professionals providing services (.10).
07/10/20	J.A. Moe, II	0.20	119.85	B160	/Denton's Fifth Interim Fee Application/ Telephone call from Nick Koffroth on sections for the Fee Application, and prepare draft of section on Motions For Relief From Stay.
07/11/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' Fifth Interim Fee Application/ Exchange E-Mails with Nick Koffroth and Claude Montgomery on descriptions for the Fee Application.
07/11/20	J.A. Moe, II	0.10	59.93	B160	/ASK LLC/ Exchange E-Mails with Joseph Steinfeld and review revised Fee Application and Notice Of Application.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/20	J.A. Moe, II	1.70	1,018.73	B160	/Dentons' Fifth Interim Fee Application/ Commence work in earnest on the narrative section of the Fee Application, creating fourteen descriptions of services, utilizing sections supplied by Dentons' attorneys, including sections prepared by John Moe, Nick Koffroth, Sam Alberts, Claude Montgomery and Karleen Murphy.
07/12/20	J.A. Moe, II	0.90	539.33	B160	/ASK LLP/ review and make revisions to, and insert references from the Declaration of Joseph Steinfeld, into the Application, and review and make minor revisions to the Declaration.
07/12/20	C. Montgomery	2.60	2,080.00	B160	Draft fee application insert for task 230 and communications with J Moe re same.
07/13/20	J.A. Moe, II	2.90	1,737.83	B160	/Dentons Fifth Interim Fee Application/ Review and revise the Application, in regard to the integration of descriptions of tasks performed during the Fifth Interim Period (2.10); identify attorneys for inclusion in the Application (.20); review the Application to conform to the parentheses (60);
07/13/20	J.A. Moe, II	1.10	659.18	B160	/ASK LLC/ Review minor changes to the Employment Application requested by Joseph Steinfeld, then prepare updated version of the Application (.30); review and make minor modification to the Notice Of Application (.10); exchange E-Mails with Mr. Steinfeld on Exhibits (.10); review the Exhibits for the Application (10); await and revise Application for internal review (.40); review work to be completed in connection with the Fee Application (.10).
07/13/20	K.M. Howard	3.60	902.70	B160	Further analysis of Debtors' billing statements from January - April 2020 and further drafting of summary of hours, fees and costs by project category for each Debtor.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/20	K.M. Howard	5.80	1,454.35	B160	Reviewed and revised Dentons' Fifth Interim Fee Application (1.3); prepared charted summary reflecting costs (.9); prepared charted summary of fees and hours by Debtor (1.2); prepared charted summaries reflecting hours and fees by project category for each Debtor reflecting (2.4).
07/14/20	J.A. Moe, II	1.00	599.25	B160	/BZBM/ Telephone call with Kerry Duffy and telephone call with Elina Tilman on Interim Fee Application (.20); review the BZBM First Interim Fee Application (.40); telephone call with Kerry Duffy on edits to the Fee Application (.30); additional telephone call with Kerry Duffy on expense item (.10).
07/14/20	J.A. Moe, II	1.80	1,078.65	B160	/ASK LLC/ Review and make additional revisions to the Employment Application adding more references from the Declaration, and inserting one part of the Declaration into the Application (.80); conform citations to Footnote in Application and Declaration (.20); continue and complete review -- through two iterations -- of the Application (.80).
07/14/20	J.A. Moe, II	0.80	479.40	B160	/Dentons Fifth Interim Fee Application/ Review and make further revisions to the Fee Application, conforming descriptions of services to each other.
07/15/20	T. Moyron	1.50	898.88	B160	Analyze and provide comments on Fifth Fee Application (1.2); correspond regarding same (.2); correspond with BRG re Fee Application (.1).
07/15/20	K.M. Howard	4.50	1,128.38	B160	Reviewed and revised Fifth Interim Fee Application, reviewed and revised Exhibit A to the Interim Fee Application (.2); reviewed Interim Fee Application and cross-referenced final numbers to charts and summaries to assure accuracy (.4); reviewed and assembled voluminous exhibits to the Interim Fee Application (3.3); prepared emails regarding each (.4); conferred with J. Moe regarding the interim fee application (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/20	K.M. Howard	0.40	100.30	B160	Reviewed BRG's Fifth Interim Fee Application (.1); prepared document for filing (.1); and filed same (.2).
07/15/20	J.A. Moe, II	3.40	2,037.45	B160	/Dentons' Fifth Interim Fee Application/ Preliminarily review the updated Fee Application, with calculations included from Kathryn Howard (.10); exchange texts with and telephone call with Ms. Howard on filing the Fee Application (.10); review and make minor additional revisions to the Fee Application and review those revisions (1.40); review and confer on procedures for additional revisions (.20); commence review of revisions (.10); confer with Tania Moyron on two additional minor revisions (.10); complete updated version of the Fee Application (1.10); review and revise all references to Exhibit "H" relating to Expenses (.30).
07/15/20	J.A. Moe, II	0.10	59.93	B160	/BRG/ Preliminarily review notice of Fee Application and exchange E-Mails on filing of the BRG Application; confer with Kathryn Howard on filing of the Application.
07/15/20	J.A. Moe, II	0.10	59.93	B160	/Fifth Interim Fee Applications/ Exchange E-Mails with James Behrens on preparing and filing the Notice Of Interim Fee Applications.
07/15/20	J.A. Moe, II	1.00	599.25	B160	/ASK LLC/ Review exchange of E-Mails by and between Tania Moyron and Joseph Steinfeld and Mr. Steinfeld's revisions to the Application and Declaration (.30); incorporate Mr. Steinfeld's revisions into the Application and Declaration (.20). telephone call returned from Mr. Steinfeld on revisions (.10); review Application to insure revisions are included (.20); exchange E-Mails with Mr. Steinfeld on Notice, make one revision to the Notice and return to Mr. Steinfeld (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/16/20	J.A. Moe, II	3.80	2,277.15	B160	/Dentons' June Monthly Fee Application/ Revise first draft of Statements for Submatters 3, 4, 5, 6, 8, 10, 12, 14, 15, 16, 17, 19, 20, 21 and the Expense Statement (3.60); telephone calls with Lauren Macksoud and Patrick Maxcy on descriptions in the Statements (.20).
07/16/20	J.A. Moe, II	0.40	239.70	B160	/Fifth Interim Fee Applications/ Review proposed Notice Of Interim Applications, and E-Mail to Hope Levy-Biehl on no Application filed by Davis Wright Tremaine, then E-Mail to Kathryn Howard on approval (.20); review James Behrens's E-Mail on Arent Fox Fee Application, review Application, review Notice, then telephone call with Kathryn Howard on Amended Notice, then E-Mail to James Behrens on Notice filed (.20).
07/16/20	K.M. Howard	2.70	677.03	B160	Reviewed Fifth Interim Fee Applications (x11) filed by all professionals, culled information for inclusion in Notice and prepared Notice of Hearing (1.4); prepared email to J. Moe (.1); telephone conference with J. Moe (.1); filed Notice of Fifth Interim Fee Applications (.3); email exchange with J. Behrans (.1); reviewed Second Interim Fee Application of Arent Fox and culled information for inclusion in Amended Notice of Hearing (.3); prepared Amended Notice of Hearing Of Professional filing a Second Interim Fee Application (.3); filed same (.1).
07/17/20	J.A. Moe, II	0.30	179.78	B160	/ASK LLP/ Revise section of the Fee Employment Application and Declaration to reflect Exhibit "B," (.20); review completed Application and Declaration, then transmit to and obtain approval from Joseph Steinfeld (.10).
07/20/20	K.M. Howard	0.40	100.30	B160	Analysis of the Notice and Application to Employ ASK, LLC as Special Counsel to Pursue Preference Actions and reviewed and revised Critical Dates Memorandum.
07/20/20	K.M. Howard	0.10	25.08	B160	Prepared email to T. Moyron regarding the Monthly Fee Application for May 2020.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	J.A. Moe, II	0.10	59.93	B160	/Dentons June Monthly Fee Application/ Confer briefly with Kathryn Howard on completing the first level of review on or before July 23rd.
07/20/20	J.A. Moe, II	1.40	838.95	B160	/ASK LLC/ Exchange E-Mails on approval of the Employment Application and Notice Of Application (.20); review and complete minor revisions to the Notice Of Application (.10); review proposed changes to the Application, due to the terms of the engagement, and exchange multiple E- Mails with Tania Moyron, on (and reviewing) the Engagement Letter (.40); review Application and Declaration for use of terms (.20); review exchange of E-Mails with Tania Moyron and Joseph Steinfeld on revising the Engagement Letter (.10); review and mark revisions to the Employment Application and Declaration to conform to the revised Engagement Letter (.30); exchange E-Mails with Tania Moyron and to Joseph Steinfeld on completion and filing of the Notice and the Application (10).
07/21/20	K.M. Howard	1.60	401.20	B160	Analysis of monthly fee applications for April and May 2020 for all professional and prepared charts reflecting 100% fees and costs (1.5); telephone conference with J. Moe regarding same (.1).
07/21/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' Fifth Interim Fee Application/ Review the LEDES formatted Statements, then exchange E-Mails with and transmit Statements to Hatty Yip.
07/21/20	J.A. Moe, II	0.10	59.93	B160	Telephone call with Kerry Duffy on preparing Declarations in support of Fifth Interim Fee Applications filed by Professionals engaged by the Debtors.
07/22/20	K.M. Howard	0.60	150.45	B160	Telephone conference with J. Moe regarding chart of professionals' fees and costs for April and May (.1); revised and finalized chart (.4); prepared email to J. Moe (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	J.A. Moe, II	0.40	239.70	B160	/Dentons' 's Fifth Interim Fee Application/ In regard to preparing a Declaration in support of Denton's Fee Application, retrieve previously filed Declaration (.2); prepare draft, then prepare entirely revised and expanded version of the Declaration Of Richard Adcock in support for Dentons' Fifth Interim Fee Application (.2).
07/23/20	J.A. Moe, II	0.10	59.93	B160	/Dentons Fifth Interim Fee Application/ Review and complete information in the proposed Declaration Of Richard Adcock to be filed in support of the Fee Application.
07/23/20	J.A. Moe, II	0.30	179.78	B160	/Dentons' June Monthly Fee Application/ Preliminarily review second draft of the Statements, and arrangements for dissemination for further review and revisions.
07/24/20	J.A. Moe, II	3.50	2,097.38	B160	/Dentons' June Monthly Fee Application/ Commence review of the first set of revisions to the Statements, and make second set of revisions to the Statements on Submatter Nos. 4, 10,14, 19 and 21 (.60); continue to make revisions to Statements on, making second set of revisions to Statements on Submatter Nos. 12 ans 20 (.30); make second set of revisions to Statements on Submatter No. 8 (.30); make second set of revisions to Statements on Submatter No. 5 (.30); make second set of revisions to Statements on Submatter No. 6 (.90); make second set of revisions to Statements on Submatter No 3., also reviewing the Expense Statement (1.10).
07/24/20	J.A. Moe, II	0.30	179.78	B160	/Davis Wright Tremaine/ Review Nara Neves' E-Mail, then confer briefly with Kathryn Howard, then telephone call with Nara Neves reviewing procedures in connection with the Fee Applications and possible further conflicts checks.
07/24/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' May Monthly Fee Application/ Review with Kathryn Howard the status of completion of the May Statements.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/24/20	K.M. Howard	1.90	476.43	B160	Reviewed and redacted privileged information from Dentons' billing statements (1.1); reviewed and revised Dentons' Monthly Fee Application for May 2020 (.4); finalized and filed Dentons' Monthly Fee Application (.4).
07/24/20	K.M. Howard	1.60	401.20	B160	Analysis of Monthly Fee Applications for May filed by Dentons, Pachulski, Bartko, Davis Wright, Nelson Hardiman, Milbank Tweed, FTI Consulting, Levene Neale, Jacob Nathan, M.D., and Tim Stacy and prepared Notice of Monthly Fee Applications of Professionals Paid by Debtors (1.3); finalized Notice and filed (.3).
07/24/20	K.M. Howard	0.40	100.30	B160	Analysis of Notice of Monthly Fee Applications for all Professionals, determined objection deadlines and reviewed and revised Critical Dates Memorandum.
07/27/20	K.M. Howard	4.30	1,078.23	B160	Analysis of and revision to Dentons' billing statements for June 2020 to bring into compliance with US Trustee Guidelines.
07/27/20	J.A. Moe, II	0.90	539.33	B160	/June Monthly Fee Application/ Review and assemble for transmittal for second set of revisions, the June Statements (.40); telephone calls to Anna Youssefi and Karleen Murphy discussing one and three entries, respectively (.20); review Kathryn Howard's corrections to the Statements, then complete preparation of Statements for transmittal and revisions (.30).
07/27/20	J.A. Moe, II	0.20	119.85	B160	/Dentons' Fee Applications/ E-Mail to Bob Richards on Dentons' May and June Applications, and on Dentons' Fifth Interim Fee Application.
07/27/20	J.A. Moe, II	0.30	179.78	B160	/Dentons Fifth Interim Fee Application/ Review and revise the Declaration Of Richard Adcock in support of the Fee Application (.20); exchange E-Mails with Tania Moyron on approval and forward (on July 28th) to Rich Adcock for signature, return and arrange for filing (on July 29th) (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	J.A. Moe, II	0.20	119.85	B160	/BZBM/ Review the June Fee Application prepared for the Bartko Law Firm, and exchange E-Mails with Kerry Duffy on the Fifth Monthly Application.
07/28/20	K.M. Howard	0.20	50.15	B160	Reviewed Bartko's monthly fee application for June 2020 (.1); email exchange with K. Duffy (.1).
07/29/20	T. Moyron	0.10	59.93	B160	Analyze Milbank Fee Application.
07/29/20	J.A. Moe, II	0.30	179.78	B160	/Dentons June Monthly Fee Application/ Review work performed on preparing Fee Applications in compliance with the U.S.Trustee Guidelines, and calculate fee reduction reflecting that work, then convey for including in the Fee Application.
07/29/20	J.A. Moe, II	0.90	539.33	B160	Review time and descriptions of services for July 24th and July 26th, and review and edit time and descriptions of services for July 27th, and prepare time and descriptions of services for July 28th .
07/30/20	K.M. Howard	0.40	100.30	B160	Email exchange with BRG and T. Moyron regarding BRG's May Fee Application (.1); reviewed and prepared BRG's fee application for filing and filed same (.3).
<b>Subtotal</b>		<b>107.20</b>	<b>48,590.25</b>		
<b>Less Discount to Client</b>			<b>(7,040.00)</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B180 - Avoidance Action Analysis**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	T. Moyron	0.60	359.55	B180	Analyze correspondence from ASK and prepare same (.3); correspond with M. Shinderman re same (.2); call with Mintz re same (.1).
07/02/20	T. Moyron	1.00	599.25	B180	Conference call with Mintz, Milbank, BRG, Dentons re ASK (.5); follow up call with D. Bleck (.2); conference call with C. Montgomery (.1); follow up emails and review same re ASK (.2).
07/06/20	S. Maizel	0.20	160.00	B180	Review and respond to emails re ASK and preferences.
07/15/20	C. Montgomery	0.30	240.00	B180	Communications with T Moyron M Shinderman and B McGrath regarding ASK avoidance claim retention and recommended demand letters.
07/16/20	T. Moyron	0.90	539.33	B180	Analyze emails from ASK (.2); analyze excel chart re preference claims (.4); prepare email to R. Adcock re engagement agreement (.1); prepare emails to ASK (.1); analyze email from S. Kahn re claims (.1).
07/16/20	P. Maxcy	0.50	369.75	B180	Review list of possible preference claims.
07/16/20	C. Montgomery	0.10	80.00	B180	Communications with M Shinderman and T Moyron regarding ASK.
07/16/20	C. Montgomery	0.20	160.00	B180	Communications with T Moyron and P Chadwick regarding ASK recommendations.
07/17/20	P. Maxcy	1.00	739.50	B180	Review preference target list and provide comments on same.
07/22/20	J.A. Moe, II	0.10	59.93	B180	/FTG Builders/ Exchange E-Mails with Shirley Cho on work being performed by ASK LLP on preferences, and review Joseph Steinfeld's E-Mail to Richard Redding.
07/24/20	P. Maxcy	0.40	295.80	B180	Discussions with Hunt counsel and P. Chadwick re removal of preference demand.
07/24/20	P. Maxcy	0.60	443.70	B180	Review settlement agreement to confirm release of Hunt claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	T. Moyron	0.20	119.85	B180	Correspond with ASK, et al. re settlement protocols.
07/28/20	J.A. Moe, II	0.40	239.70	B180	Review E-Mails from and exchanged with Bridgett McGrath on preference actions (.10); participate in conference telephone call with Joseph Steinfeld and Bridgett McGrath, and other Attorneys, on process of and procedures for preference actions (.30).
07/30/20	G. Medina	0.70	205.28	B180	Review complaints filed and created form caption and relevant pages including downloading form cover sheet for adversary proceedings and send to Brigette McGrath for her consideration.
<b>Subtotal</b>		<b>7.20</b>	<b>4,611.64</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	N. Koffroth	1.10	551.65	B185	Draft motion to extend deadline to assume or reject leases of non-residential real property.
07/08/20	G. Medina	0.50	146.63	B185	Communication with N. Koffroth regarding Filing (0.1); review and filed Notice of motion/application and Seventh Motion for Entry of an Order Pursuant to § 365(d)(4) of the Bankruptcy Code Extending the Time to Assume or Reject Unexpired Non Residential Leases (0.3); download and send efiled copy to team (0.1).
07/08/20	N. Koffroth	0.60	300.90	B185	Draft motion to extend deadline to assume or reject leases of non-residential real property
07/09/20	C. Doherty, Jr.	0.10	37.40	B185	Send communication re service of lease motion
07/20/20	G. Medina	1.40	410.55	B185	Received and reviewed Sixth Omnibus claims Motion for B. Richards (0.1); reviewed and prepared/assembled for filing (0.4); review court's self calendaring hearing dates (0.2); call with N. Koffroth regarding hearing dates (0.1); call with B. Richards regarding edits to motion (0.1); received reassembled and filed (0.5).
07/20/20	D. Pina	0.20	63.75	B185	Communications and coordination with G. Medina regarding preparation and filing of 6th omnibus motion to reject contracts.
07/20/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Sixth Omnibus Motion to Reject Certain Executory Contracts and Unexpired Leases and reviewed and revised Critical Dates Memorandum.
07/21/20	G. Miller	1.30	574.60	B185	Review Huntington lease and lease termination agreements and prior correspondence re same (1); email J. Schlant re same (.3).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	G. Medina	0.60	175.95	B185	Received reviewed and filed Stipulation by Verity Health System of California, Inc. and Kaiser Foundation Hospitals and California Transplant Services, Inc.'s continuing hearing and related deadlines concerning objections to cure amounts edit and upload order (0.4); download and send e file copy to team (0.2)
07/28/20	K.M. Howard	0.40	100.30	B185	Analysis of the court's notice setting Debtors' Seventh Motion to Extend the Time to Assume or Reject Unexpired Leases of Nonresidential Real Property and reviewed and revised Critical Dates Memorandum.
07/29/20	C. Doherty, Jr.	0.20	74.80	B185	Review Prior Pleadings re questions re rejected contracts
07/29/20	K.M. Howard	0.40	100.30	B185	Analysis of the court's tentative ruling extending the 365(d) assumption/rejection deadline and reviewed and revised Critical Dates Memorandum.
07/30/20	J.A. Moe, II	0.10	59.93	B185	Respond to Shirley Cho's E-Mail and telephone call to Charles Stinson on lease payment to Dell Financial Services.
<b>Subtotal</b>		<b>7.30</b>	<b>2,697.06</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K.M. Howard	0.40	100.30	B190	/Committee Litigation/Analysis of order approving the stipulation regarding pretrial and status conferences in the UCC Litigation and reviewed and revised Critical Dates Memorandum.
07/10/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Telephone call returned to Kerry Duffy discussing the CMC Statement, then review and approve the CMC Statement (on July 11th).
07/14/20	K. Murphy	0.10	41.65	B190	/Lara/Johns / Analyze and respond to email from Verity re recent attorney bill from Alston & Bird.
07/14/20	K. Murphy	0.10	41.65	B190	/Lara/Johns / Analyze and respond to email from Elspeth Paul identifying handling attorney for matter at Alston & Bird.
07/14/20	J.A. Moe, II	0.10	59.93	B190	/Lara - Johns - Verity/ Review multiple E-Mails on Case Management Conference Statement, including to and from Samuel Park, Elspeth Paul and Karleen Murphy, and Statement to be filed.
07/14/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Review letter from Joel Glaser, letter from John Moe to Mr. Glaser, and exchange E-Mails with An Ruda and Elina Tilman on acceptance of service of process.
07/15/20	K. Murphy	0.20	83.30	B190	/Lara/Johns / Analyze and respond to email from Elspeth Paul re case status (.1); and telephone call with John Moe re same to prepare for responding to Ms. Paul's email (.1).
07/15/20	J.A. Moe, II	0.10	59.93	B190	/Lara - Liera - Verity/ Telephone call with Karleen Murphy on responding to Elspeth Paul on status of the Litigation, and formulating return E-Mail to Ms. Paul, including proposed conference with Alston & Bird.
07/17/20	K.M. Howard	0.30	75.23	B190	Reviewed court's notices continuing the status conference and the case management conference and reviewed and revised Litigation Management Chart.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	K. Murphy	0.20	83.30	B190	/Lara/Johns / Analyze and respond to emails from Elspeth Paul and confer with John Moe re setting call with Alston & Bird attorneys for case discussion (.1); and confer with Sam Park re the same (.1).
07/21/20	K. Murphy	0.20	83.30	B190	/ Sanford / Analyze LA Superior Court Website to confirm upcoming Status Conference (.1); and draft Status Conference Statement with email to John Moe enclosing the same (.1).
07/21/20	K. Murphy	0.20	83.30	B190	/ Sanford / Draft email to Elina Tilman re upcoming CMC and Status Conference re Bankruptcy (.1); and confer with John Moe re same (.1).
07/22/20	G. Medina	0.60	175.95	B190	Received reviewed and filed Stipulation By Verity Health System of California, Inc. and AT&T Corp., AT&T Services, Inc., and Their Affiliates, Resolving Cure Objection edit and upload order (0.4); download and send e filed copy to team (0.2).
07/22/20	J.A. Moe, II	0.20	119.85	B190	/Mesha Sanford v. Verity/ Review exchange of E-Mails with Karleen Murphy and Elina Tilman on proposed contents and appearances in the future, in regard to case where Order on relief from stay has been entered (.10); review additional exchanges of E-Mails between Ms. Murphy and Kerry Duffy on CMC Statement and upcoming hearing, and review of Bartko's CMC Statement (.10).
07/23/20	K. Murphy	0.60	249.90	B190	/Lara/Johns / Telephone call with John Moe, Elspeth Paul, and Alston & Bird litigation counsel re case status (.4); prepare edits to Dentons Litigation Management Chart re estimated outside settlement value (.1); and determine full names of Plaintiffs and email the same to John Moe (.1).
07/27/20	K.M. Howard	0.20	50.15	B190	Reviewed and revised Critical Dates Memorandum regarding the continuance of the pretrial conference in Verity v. Heritage.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	J.A. Moe, II	0.10	59.93	B190	/Ancira Mateo v. Verity/ Review letter addressed to Marshall Silberberg, from Will Collins, on DHCS/Medi-Cal Lien, and forward to Karen Chapman.
07/28/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Review status of, and prepare for appearance on July 29th on Case Management Conference.
07/29/20	J.A. Moe, II	0.40	239.70	B190	/Mesha Sanford v. Verity/ Appear in Department 78 on Status Conference.
07/29/20	J.A. Moe, II	0.30	179.78	B190	/Mesha Sanford v. Verity/ Prepare for, await appearance, responding to questions from Judge on status of the bankruptcy cases, and Case Management Conference being continued to September 25th.
07/29/20	K. Murphy	0.10	41.65	B190	Analyze and respond to email from Hope Levy Biel re attending team call to discuss post confirmation case handling of state court matters.
07/30/20	J.A. Moe, II	0.10	59.93	B190	Telephone call returned from Jessica Cynowiec, on process of calculating the amount of time given to Defendants to answer a Complaint after relief from stay is granted.
07/30/20	K. Murphy	0.10	41.65	B190	Analyze and respond to email from Hope Levy Biel re rescheduling of team call re post confirmation case handling of state court matters.
07/31/20	K. Murphy	0.40	166.60	B190	Telephone call with Elspeth Paul, Hope Levy Beil, Elina Tilman, John Moe, and An Ruda re handling of state court matters following confirmation of Plan (.3); and follow up call to John Moe re same (.1);
<b>Subtotal</b>		<b>5.30</b>	<b>2,276.77</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B210 - Business Operations**

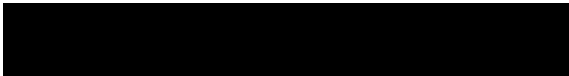
Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	S. Maizel	0.70	560.00	B210	Review and respond to emails re Vitalant's effort to terminate Blood Services Agreement.
07/02/20	J.A. Moe, II	0.40	239.70	B210	In regard to blood supplies at Seton, telephone call with Norm Haslum on issue over contract with Blood Supplier and necessity to correct Contracts and insure continuing supply of blood to Seton.
07/06/20	S. Maizel	0.80	640.00	B210	Telephone conference with Hope Levy Biehl, etc. re health plan overpayments.
	<b>Subtotal</b>	<b>1.90</b>	<b>1,439.70</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	S. Alberts	1.40	1,120.00	B220	 conference with Ropes (1.0).
07/02/20	T. Moyron	0.20	119.85	B220	Analyze correspondence from Ropes and Gray re pension plan (.1); analyze correspondence from BRG and KCC re Seton designation (.1)
07/08/20	S. Alberts	0.80	640.00	B220	VHS Pension. Review PBGC's changes and provide comment (.2), communicate with co-counsel regarding changes sought by PBGC and potential problem with changes (.2), communicate with PBGC about concerns and next steps (.2), review revisions and provide clearance (.1) and follow up with T. Moyron (.1).
07/08/20	G. Medina	0.40	117.30	B220	Review and file PBGC 9019 Motion and send efiled copy to T. Moyron, M. Zeefe, D. Pina and N. Koffroth.
07/09/20	M. Zeefe	1.30	624.33	B220	Research pension trust agreement issues re Local 39 (1.1); emails re RPHE trust agreement (0.1); emails re Allscripts claims (0.1).
07/10/20	M. Zeefe	0.30	144.08	B220	Emails re RPHE and Local 39.
07/10/20	S. Alberts	1.00	800.00	B220	VHS Pension. Communicate with T. Moyron about status of RPHE and Local 39 DB Plan withdrawals (.1), follow up with Ropes and Gray about withdrawals (.2) and with working group about termination of Local 39 Trust agreement and RPHE Trust Agreement (.2) and follow up about motions (.2), communications about Local 39 pension audit (.3).
07/11/20	M. Zeefe	1.80	864.45	B220	Draft motion to reject RPHE trust agreement.
07/12/20	M. Zeefe	5.40	2,593.35	B220	Continue drafting motion to reject RPHE trust agreement (3.0); research re same (2.3); call with N. Koffroth (0.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/20	M. Zeefe	3.70	1,776.93	B220	Revise motion to reject RPHE trust agreement (2.4); draft application for shortened notice (1.0); emails re same (0.1); call with T. Moyron (0.2).
07/13/20	S. Alberts	1.40	1,120.00	B220	Receive and review and comment on RPHE Trust rejection motion (.5), follow up communications regarding response (.2), review and respond to Local 39 trust rejection motion (.5) and follow up (.2).
07/14/20	S. Alberts	0.50	400.00	B220	VHS Pension. Receive, review and assess pension question and respond to T. Connor (.3); Emails about motion to reject RPHE Trust (.2).
07/14/20	M. Zeefe	1.30	624.33	B220	Call with S. Alberts re Local 39 (0.1); review claims and trust agreements re same (0.2); calls with T. Moyron re RPHE trust agreement rejection (0.2); revise motion re same (0.8).
07/15/20	M. Zeefe	1.90	912.48	B220	Emails with R. Adcock, D. Galfus, Dentons team re finalizing RPHE rejection motion for filing (1.8); calls with T. Moyron re same (0.1).
07/15/20	S. Alberts	2.00	1,600.00	B220	Review and provide comments and further communications with respect to Local 39 Trust Agreements (1.1) and RPHE Trust (.5), follow up communication with M. Zeefe about date of rejection question from D. Galfus (.2) and follow up with D. Galfus (.2).
07/16/20	M. Zeefe	5.20	2,497.30	B220	Revise and finalize for filing motion to reject RPHE trust agreement and corresponding application for order shortening notice (3.4); calls with T. Moyron and N. Koffroth re same (0.2); Revise and finalize for filing motion to reject Local 39 trust agreements and corresponding application for order shortening notice (1.2); calls with T. Moyron re same (0.4).
07/16/20	S. Alberts	0.30	240.00	B220	Communications about RPHE contribution payment.
07/17/20	S. Alberts	0.20	160.00	B220	Communications about motions to reject Local 39 and RPHE Trust agreements.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	K.M. Howard	0.40	100.30	B220	Analysis of Order approving Motion Shortening Time to Debtors' Motion to Reject Local 39 Pension and Trust Agreements, determined changes made by the court and reviewed and revised Critical Dates Memorandum.
07/17/20	K.M. Howard	0.50	125.38	B220	Analysis of Debtors' Notice and Motion to Reject Local 39 Pension and Trust Agreements and reviewed and revised Critical Dates Memorandum (.3); analysis of Debtors' Amended Notice and revised Critical Dates Memorandum accordingly (.2).
07/17/20	K.M. Howard	0.40	100.30	B220	Analysis of Debtors Notice, Application Shortening Time and Motion to Reject Trust Agreement for the Retirement Plan for Hospital Employees and reviewed and revised Critical Dates Memorandum.
07/22/20	S. Maizel	0.40	320.00	B220	Review and respond to email from S. Alberts re CNA issues.
07/28/20	S. Alberts	1.60	1,280.00	B220	Pension call (.4), Conference with C. Montgomery about pension claim issues (.4); clean up and integrate elements of prior settlement offer to RPHE to current offer and circulate to client (.4), follow up with client and BRG (.2), email to R Lapping about resumption of settlement communications with RPHE (.2).
07/28/20	S. Alberts	0.10	80.00	B220	Review tentative ruling approving settlement.
07/28/20	C. Montgomery	1.20	960.00	B220	Communications with M Zeefe and S Alberts regarding motion to rejection RPHE trust agreement (.4); communications with A Ruda and S Alberts regarding Local 39 settlement (.2); phone call with S Albert regarding RPHE issues (.6)
07/29/20	S. Alberts	0.10	80.00	B220	Email communication with RPHE and co-counsel.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	S. Alberts	2.20	1,760.00	B220	Review background materials for discussion with RPHE (.3), conference with RPHE (.7), follow up call with co-counsel on how best to proceed with RPHE (.8), and follow up with Ty Conner (.1), obtain info from T. Conner and review (.2) and follow up with C. Montgomery (.1).
07/30/20	S. Alberts	0.60	480.00	B220	Conference with T. Moyron, M. Zeefe about status of union and pension issues and needed next steps.
<b>Subtotal</b>		<b>36.60</b>	<b>21,640.38</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B230 - Financing/Cash Collections**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	D. Pina	0.30	95.63	B230	Review executed 15th Amended Confidentiality Agreement with UMB Bank (.1); update electronic case records and distribute copy (.2).
07/10/20	N. Koffroth	1.80	902.70	B230	Draft fifth amended cash collateral stipulation
07/14/20	C. Montgomery	0.30	240.00	B230	Review draft cash collateral stipulation and order.
07/16/20	T. Moyron	0.70	419.48	B230	Analyze email from J. Schlant re budget and related attachments (.2); call with P. Chadwick re budget and related matters (.3); analyze J. Schlant correspondence re timing inquiry (.1); call with N. Koffroth re timing and order (.1).
07/16/20	N. Koffroth	0.80	401.20	B230	Draft Fifth Amended Supplemental Cash Collateral Order
07/16/20	C. Montgomery	0.40	320.00	B230	Communications with P Chadwick, N Koffroth, T Moyron re cash collateral stipulation (.1); review revised budget (.2); communications with J Reed re same (.1)
07/17/20	T. Moyron	0.50	299.63	B230	Analyze J. Schlant emails and budget and recovery analysis (.4); prepare emails regarding same (.1).
07/17/20	K.M. Howard	0.40	100.30	B230	Analysis of the order approving and changing the terms of the Stipulations among Verity MOB Financing II, Verity MOB Financing and the UCC extending Challenge Deadline and reviewed and revised Critical Dates Memorandum accordingly.
07/17/20	C. Montgomery	0.50	400.00	B230	Phone call with T Moyron regarding cash collateral consent delay and related matters.
07/17/20	N. Koffroth	2.20	1,103.30	B230	Draft Fifth Amended Supplemental Cash Collateral Order and stipulation
07/17/20	K.M. Howard	0.40	100.30	B230	Analysis of Stipulation between Verity MOB Financing LLC and the UCC Extending Challenge Deadline and reviewed and revised Critical Dates Memorandum.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	K.M. Howard	0.40	100.30	B230	Analysis of Stipulation between Verity MOB Financing II and the UCC Extending Challenge Deadline and reviewed and revised Critical Dates Memorandum.
07/20/20	N. Koffroth	0.80	401.20	B230	Draft First Amended Supplemental Cash Collateral Stipulation
07/20/20	K.M. Howard	0.70	175.53	B230	Analysis of Fourth Amended Supplemental Cash Collateral Order to Authorize Continued Use of Cash Collateral, Grant Adequate Protection and to Modify Automatic Stay, and Analysis of Order approving same and reviewed and revised Critical Dates Memorandum.
07/20/20	T. Moyron	0.40	239.70	B230	Analyze final cash collateral stipulation (.2) and related emails (.2).
07/27/20	K.M. Howard	0.20	50.15	B230	Reviewed and revised Critical Dates Memorandum regarding the deadline to file an order further extending cash collateral use if necessary.
07/27/20	K.M. Howard	0.20	50.15	B230	Reviewed and revised the Critical Dates Memorandum regarding the deadline for all conditions precedent to the Plan Effective Date to be satisfied or waived.
07/30/20	G. Medina	1.40	410.55	B230	Communication with T. Moyron and N. Koffroth regarding MOB Stipulation (0.1); Conformed and revised Stipulations drafted (1.2) review request from Brigitte McGrath to pull Verity Form Complaint and cover sheet (0.1).
<b>Subtotal</b>		<b>12.40</b>	<b>5,810.12</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B240 - Tax Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	T. Santoli	6.70	5,353.30	B240	Review and revise Revised Liquidating Trust Agreement (1.3); attention to tax issues with respect to Liquidating Trustees activities related to the Post-Effective Date Debtors (1.9); review and revise revised Plan (1.9); attention to tax classification related to dispute ownership fund (.8); Attention to plan to confirm that the Liquidating Trust qualifies as a Liquidating trust for tax purposes. (.8).
07/17/20	T. Santoli	1.50	1,198.50	B240	Review of revised Liquidating Trust Agreement and Plan as it relates to the revisions in the Liquidating Trust Agreement.
07/22/20	T. Santoli	1.00	799.00	B240	Review of revised liquidating trust agreement (.6) and rev proc 94-45 in connection with review of liquidating trust agreement (.4).
07/29/20	T. Santoli	0.50	399.50	B240	Review revised Liquidating trust (.3) and revised Plan (.2).
<b>Subtotal</b>		<b>9.70</b>	<b>7,750.30</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B250 - Real Estate**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	M.M. Welch	0.60	160.65	B250	Respond to email communication from Attorney Moyron (.20); telephone communication with Jon Emerson with (.20); telephone conference with Attorney Moyron, Jon Emerson of BRG, Claude Montgomery regarding UCC and Lien Searches (.2).
	<b>Subtotal</b>	<b>0.60</b>	<b>160.65</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K. Murphy	0.20	83.30	B300	Telephone call with John Moe and Elina Tilman re SIR for Rapp matter for updates to estimates of post petition EPL SIR amounts (.1); and analyze email from Elina Tilman re the same (.1).
07/02/20	J.A. Moe, II	0.10	59.93	B300	Review exchange of multiple E-Mails with Tania Moyron and Claude Montgomery on Administrative Claims and the Bar Date on such Claims.
07/02/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of the Administrative Claims, confer with Karleen Murphy on Mike Fayfel's Claim, as prepetition and post-petition reported.
07/02/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of the Administrative Claims in connection with the Plan, confer with Karleen Murphy on the necessity to obtain SIR from Elina Tilman, and review of how to proceed.
07/02/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, revise and complete two sets of documents on Unliquidated Administrative Claims.
07/03/20	R. Richards	0.20	144.60	B300	Check claims register, follow up emails and call re amended California Tax Claims.
07/03/20	S. Maizel	0.80	640.00	B300	Review and revise memo to UCC counsel re Nantworks claims.
07/03/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review E-Mail from Elina Tilman and E-Mail to Karleen Murphy on SIRs and completion of the Chart regarding the SIRs.
07/03/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims, telephone call with Andres Estrada on publication of two Notices (.10); E-Mail to Jon Emerson on names and addresses of Administrative Claimants (.10).
07/03/20	J.A. Moe, II	0.10	59.93	B300	/Administrative Claims - DaVita/ Review exchange of E-Mails with Mike Winston on Claim being asserted by DaVita.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/04/20	J.A. Moe, II	0.10	59.93	B300	In regard to the publication of two Notices, confer with Andres Estrada on publishing the Notices, including the Administrative Claims Bar Date Notice.
07/05/20	J.A. Moe, II	0.30	179.78	B300	In regard to the Plan, review the form and contents of the Administrative Claims Bar Date Notice, and E-Mail to Andres Estrada conferring on publication and service list (.10); telephone call with Andres Estrada on preparing the four Notices for publication (USA Today, LA Times, SF Chronicle and Mercury News) (.20).
07/06/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, telephone call with Karleen Murphy on the SIR for Dwight Rapp, and the necessity to circulate conclusion on the amount of the SIR.
07/06/20	J.A. Moe, II	0.80	479.40	B300	In regard to Notice Of Bar Date on Administrative Claims: E-Mail to and telephone call to Tania Moyron on completing the Notices (.10); review Notice and E-Mail to Andres Estrada on approval to proceed (.10); telephone call to Mr. Estrada on approval to proceed and laying out plan to complete Notices (.10); additional call with Mr. Estrada reviewing the four Notices and drafting E-Mail to internal team on approval and proceeding with Notices (.50).
07/06/20	M. Zeefe	0.10	48.03	B300	Emails with S. Alberts re Local 39 claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	J.A. Moe, II	3.30	1,977.53	B300	In regard to the review of the Notice of Administrative Bar Date to be published, E-Mail to Andres Estrada on Notice (.10); review first Notice, including review of one change (.20); E-Mails to internal teams and telephone call from Nick Koffroth on one change (.20); telephone call with Andres Estrada on publication (.10); telephone call from Andres Estrada on second and third Notices for publication, and E-Mail to internal team for review (.20); telephone call with Andres Estrada on review (.10); review Tania Moyron's comments (.20); prepare E-Mail identifying the five changes to four Notices (.40); exchange E-Mails with Andres Estrada, and telephone call with Mr. Estrada, Mr. Koffroth and E-Mail to Tania Moyron on correction of paragraph 4 (.30); obtain conformed copy of the Notice and transmit to Mr. Milner as requested (.10); telephone call with Tania Moyron, then telephone call with Andres Estrada, then revise paragraph 4 of the Notice and return to Mr. Estrada (.30); in regard to service of the Bar Date Notice on those asserting "claims," extract and transmit list of parties asserting "claims" to Karleen Murphy (.20); continue to work through five changes to the Bar Date Notice, create two separate versions, then transmit two versions for internal review and one version for outside review as requested by Ms. Moyron and Mr. Koffroth (.80); telephone call with Mr. Estrada on procedures to complete Notice Of Bar Date (.10).
07/06/20	J.A. Moe, II	0.60	359.55	B300	In regard to service of the Administrative Bar Date Notice, two telephone calls to Jon Emerson discussing the Service List (.20); E-Mail to internal team on who is to be served with the Administrative Claims Bar Date Notice (.20); telephone call from John Schlant on creation of employee list and theory of who is to be served (.10.); exchange E-Mails with Tania Moyron with cost of service and telephone call (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	J.A. Moe, II	0.60	359.55	B300	In regard to the Administrative Claims Bar Date Notice, telephone conference with Karleen Murphy on updating the List of "claimants" who have filed actions or litigation since October 7th, for service of the Notice.
07/06/20	T. Moyron	0.50	299.63	B300	Conference call with J. Moe re administrative bar date notice (.1); analyze emails from KCC, et al. regarding publication notices and provide comments (.4).
07/06/20	K. Murphy	0.70	291.55	B300	Telephone call with John Moe re identification of name and addresses for litigation claimants for administrative bar date notice (.6); and follow up call with John Moe re same (.1).
07/07/20	K. Murphy	4.20	1,749.30	B300	Initial telephone call with John Moe to further discuss assignment for new chart re identification of names and addresses for litigation claimants for administrative bar date notice (.1); prepare initial draft of chart (1.0); analyze APA Exhibits for SMC, SFMC, and SVMC to cross reference chart information for recent updates (.4); determine additional information for various notices of intent and date of incident for decision on whether to include in chart (.4) and telephone calls with John Moe re the same (.2); follow up call with John Moe, including Andres Estrada, to discuss chart information and preparation of edits to initial draft (1.1); and prepare final draft of chart (1.0).
07/07/20	K. Murphy	0.20	83.30	B300	Draft email to Karen Chapman and Elina Tilman seeking various addresses of identified claimants for inclusion into chart for administrative bar date notice (.1); and analyze responses enclosing requested addresses and add to chart (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

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07/07/20	K. Murphy	0.40	166.60	B300	Conduct research on background for Board of Pharmacy matter with upcoming hearing at Office of Administrative Hearing in Oakland, CA and analyze relevant documents to determine whether matter is relevant to updates on chart for notice of administrative bar date (.3); and draft email to Karen Chapman and Hope Levy Biel re the same (.1).
07/07/20	T. Moyron	0.30	179.78	B300	Analyze correspondence and documents re notice of administrative bar date, publications, etc.
07/07/20	T. Moyron	0.60	359.55	B300	Conference call with R. Adcock re Committee standing and preliminary analysis of Nant/Integrity claims (.3); conference call with S. Maizel and C. Montgomery regarding same (.3).
07/07/20	J.A. Moe, II	0.40	239.70	B300	In regard to the "mail service version" of the Notice Of Administrative Claims Bar Date, review Notice and draft E-Mail on two changes to the Notice in comparison as to what was filed with the Court (.30); exchange E-Mails with Peter Chadwick on response to proposal (.10).
07/07/20	J.A. Moe, II	1.60	958.80	B300	In regard to service of the Administrative Claims Bar Date Notice, review with Karleen Murphy the continued work on creation of the updated/new list of newly identified parties (.10); second telephone call with Jon Emerson on cost of service (.10); extended telephone call with Ms. Murphy, and for part of the call with Andres Estrada, on reviewing names and addresses for inclusion in List (1.10); additional telephone calls with Ms. Murphy on review of additional names (.20); review Andres Estrada's E-Mail on numbers of parties to be served, and necessity to "split out" list before and after October 7th (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	J.A. Moe, II	0.30	179.78	B300	In regard to the Notices on the Administrative Claims Bar Date, review E-Mail from Andres Estrada on publication of the Notices, then two telephone calls with Andres Estrada on publishing Notices, then proceeding with completing the Notice to be served.
07/07/20	J.A. Moe, II	0.20	119.85	B300	In regard to service of the Notice of the Administrative Claims Bar Date, telephone call with Jon Emerson on List of parties to be served differentiated before and after October 7th (.10); additional telephone call with Karleen Murphy on completed list of new "litigants." (.10).
07/07/20	J.A. Moe, II	0.30	179.78	B300	In regard to service of the Administrative Claims Bar Date Notice: Exchange E-Mails with Andres Estrada on service of the Notice, then telephone call with Mr. Emerson as to the difference in the Lists (.10); E-Mail with Tania Moyron confirming the use of the complete List, then telephone call to Andres Estrada on utilizing the complete List (.20).
07/07/20	J.A. Moe, II	0.10	59.93	B300	In regard to service of the Administrative Claims Bar Date Notice, review List of additional Litigants and E-Mail to Andres Estrada the additional List.
07/08/20	J.A. Moe, II	0.20	119.85	B300	In regard to service of the Administrative Claims Bar Date Notice, review Andres Estrada's E-Mail and confirm List being used to serve the Notice and contents of the Notice being served.
07/08/20	S. Maizel	0.30	240.00	B300	Telephone conference with BRG, etc. re RPHE claims.
07/08/20	S. Alberts	0.40	320.00	B300	VHS Claims. Emails and then calls with Claims Agent about RPHE and other claims.
07/08/20	N. Koffroth	0.50	250.75	B300	Participate in call with T. Moyron, H. Kevane, et al. re treatment of certain claims
07/08/20	T. Moyron	0.20	119.85	B300	Exchange emails with D. Cohen re Fresenius claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/20	M. Zeefe	3.40	1,632.85	B300	Emails (with PBGC, Committee, lenders, client, BRG, team) re motion to approve settlement with PBGC (1.4); call with M. Harris and C. Salembier re same (0.1); call with S. Alberts re same (0.1); call with L. Butler, M. Harris, C. Salembier, S. Alberts re same (0.1); calls with T. Moyron re same (0.1); finalize same and coordinate filing (0.2); emails re RPHE (0.1); call with S. Alberts re research relating to Local 39 (0.1); research same (1.2).
07/09/20	T. Moyron	0.30	179.78	B300	Conference call with Fresenius, H. Kevane, et al. re claims.
07/09/20	J.A. Moe, II	0.10	59.93	B300	/PBGC/ Review Motion on resolution of issues and claims asserted by the PBGC.
07/09/20	J.A. Moe, II	0.40	239.70	B300	In regard to the amount of Administrative Claims, complete, revise and transmit two E-Mails in regard to review and analysis of the Administrative Claims.
07/09/20	J.A. Moe, II	0.30	179.78	B300	In regard to the Administrative Claims filed by Old Republic, exchange E-Mail with Robert Millner, telephone call to Andres Estrada, obtain and review Claims and transmit to Mr. Millner.
07/10/20	R. Richards	0.80	578.40	B300	Review US Food administrative claims (0.2); call and emails re same (0.3); review Long Beach Hospital administrative claim (0.2); call with Jon Emerson of BRG (0.1).
07/10/20	G. Medina	0.70	205.28	B300	Pull and research claims estimation motion samples from various cases per the request of N. Koffroth.
07/10/20	T. Moyron	2.30	1,378.28	B300	Conference call with with BRG, J. Moe, et al. re claims (.8); analyze claims and correspondence related thereto (.7); conference call with H. Kevane, M. Shinderman, et al. (.5); correspondence from H. Kevane, et al., re reply (.1); correspondence with H. Kevane, et al., re SVIPA (.2).
07/10/20	N. Koffroth	0.70	351.05	B300	Participate in call with P. Chadwick, J. Emerson, et al. re analysis of potential determination motions

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	C. Montgomery	0.80	640.00	B300	Communications with H Kevane regarding St. Vincent IPA Application re Administrative Expense Claim (.1); participate in phone conference regarding large claim resolution and voting with T Moyron, J Emerson, S Alberts, P Chadwick, J Moe and M Zeefe (.7)
07/10/20	J.A. Moe, II	0.30	179.78	B300	In regard to the analysis of Administrative Claims, review with Bob Richards his request for Claims, confer with Andres Estrada, obtain List Of Administrative and 503 (b)(9) Claims from Mr. Estrada, and transmit to Mr. Richards.
07/10/20	J.A. Moe, II	0.40	239.70	B300	In regard to the analysis of Administrative Claims, and in regard to Robert Millner's request for the Addenda filed with Old Republic's Claims, exchange E-Mails with, and telephone call to Andres Estrada on Addenda to the Claims (.20); telephone call to Margaret Anderson on Addenda (.10); telephone call to Robert Millner on Addenda (.10).
07/10/20	J.A. Moe, II	0.10	59.93	B300	In regard to the amount of Administrative Claims, telephone call to Jon Emerson discussing the analysis of Claims.
07/10/20	J.A. Moe, II	0.10	59.93	B300	In regard to Administrative Claims, consider and prepare E-Mail to Tania Moyron and Robert Millner on Stipulation with Claimant.
07/10/20	J.A. Moe, II	1.20	719.10	B300	In regard to the administration of Claims, conference call with Dentons Attorneys, representatives of BRG and representatives of KCC, on review of large general unsecured claims (.70); review and identify the Stipulations and Orders on relief from stay on whether Claims were withdrawn (.10); prepare E-Mail to Bob Richards on status of seventeen large general unsecured claims (.30); exchange multiple E-Mails with Bob Richards on Claims asserted by Eduardo Vasquez and by Doris Thompson (.10).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/11/20	C. Montgomery	0.80	640.00	B300	Communications with SAlberts, T Moyron, JMoe re Union claim objection reasoning (.5); communications with N Koffroth, J Moe, R Richards and P Maxcy re non union claim objections (.3)
07/11/20	S. Alberts	0.30	240.00	B300	VHS Claims. Communications regarding potential estimation/claim objection about union claims for confirmation.
07/11/20	S. Alberts	0.30	240.00	B300	VHS Plan. Emails with J. Si about updating retiree health care claimant and claim chart (.2) and follow up review of produced materials (.1).
07/14/20	R. Richards	0.70	506.10	B300	Call and email re Long Beach Administrative Claim (0.2); emails with Emerson of BRG (0.1); call re Marillac (0.4).
07/14/20	C. Montgomery	0.10	80.00	B300	Communications with N Koffroth, P Maxcy regarding determination motions.
07/14/20	N. Koffroth	0.40	200.60	B300	Participate in call with H. Kevane, et al. re issues related to certain potential claim objections
07/15/20	C. Montgomery	0.10	80.00	B300	Phone call with N Koffroth regarding Union Claims objections.
07/15/20	M. Zeefe	0.30	144.08	B300	Team call re GUC claims.
07/16/20	T. Moyron	1.40	838.95	B300	Conference call with BRG, M. Zeefe et al. re deadline and objections (.8); analyze various claims (.4) ; analyze excel sheet re claims (.2).
07/16/20	T. Moyron	0.70	419.48	B300	Conference calls with N. Koffroth (.3), (.1), (.3) regarding plan and claim matters.
07/16/20	T. Moyron	0.10	59.93	B300	Conference call with P. Saba re settlement proposal.
07/16/20	T. Moyron	1.40	838.95	B300	Analyze Allscript claims (.6); analyze summary of union claims (.5); analyze correspondence regarding same (.3).
07/16/20	T. Moyron	0.90	539.33	B300	Analyze updated motion to reject re Local 39 (.3); analyze updated OST documents (.2); correspond regarding same (.2); conference call with M. Zeefe re same (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/16/20	N. Koffroth	0.80	401.20	B300	Participate in call with J. Emerson, D. Galfus, et al. re determination motions
07/16/20	C. Montgomery	0.60	480.00	B300	Communications with N Koffroth T Moyron D Bleck regarding Plan Supplement deadlines (.1); phone call D Galfus re Trustee issues (.5)
07/16/20	C. Montgomery	1.00	800.00	B300	Participate in conference call N Koffroth, J Emerson, D Galfus, T Moyron, M Zeefe, B Greer regarding claims determinations (.8); follow up call with D Galfus and J Emerson (.2)
07/17/20	T. Moyron	1.70	1,018.73	B300	Call with A. Ruegger, et al., re claims subject to potential determination motions and related matters (1.1); analyze excel sheets, claims and related matters (.6).
07/17/20	C. Montgomery	2.40	1,920.00	B300	Communications with M Zeefe and T Moyron regarding Allscripts (.8); communications with P Chadwick J Emerson, T Moyron re same (.1) ; communications and Phone calls with T Moyron, J Moe regarding GUC claims (.4); phone call with A Ruegger, T Moyron, M Zeefe, S Maizel, N Koffroth re determination motions (1.1)
07/17/20	N. Koffroth	1.50	752.25	B300	Participate in internal call analyzing issues re filing determination motions for plan voting purposes x 2 (0.3) (1.2)
07/17/20	G. Medina	0.80	234.60	B300	Conference Call related to claims estimation and determination with Dentons Team (0.4); Review claims, claims estimation motions referenced on call (0.4).
07/18/20	T. Moyron	0.80	479.40	B300	Conference call with Milbank re documents for determination motion (.5); call with N. Nguyen regarding same (.2); follow up call with J. Behrens (.1).
07/18/20	A. Ruegger	0.90	720.00	B300	Review N. Koffroth memo re determination motion for union claims, and attachments.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/19/20	A. Ruegger	7.30	5,840.00	B300	Review claims analyses by M. Zeefe (1.2); communications with T. Moyron, M. Zeefe and G. Medina re union claims for inclusion in Determination Motion (1.7); review prior pleadings re objections to claims for precedent in Determination Motion (2.0); begin draft of Determination Motion (2.4).
07/19/20	G. Medina	0.90	263.93	B300	Review communications and pull/send numerous claims to A. Ruegger regarding preperation of claims determination motions.
07/20/20	T. Moyron	1.40	838.95	B300	Internal call regarding determination motions (.6); conference call with Committee counsel re determination motions (.4); analyze claim details and next steps (.4).
07/20/20	T. Moyron	0.60	359.55	B300	Conference call with counsel for Toyon (.3); correspond regarding same on administrative claims (.3).
07/20/20	N. Koffroth	0.70	351.05	B300	Participate in internal call analyzing issues re determination motions
07/20/20	N. Koffroth	0.40	200.60	B300	Participate in call with M. Shinderman, J. Behrens, et al. re detmination motion issues
07/20/20	C. Montgomery	4.50	3,600.00	B300	Communications with N Koffroth and T Moyron re determination motions (.1); participate in phone conference with S Alberts, J Moe, T Moyron re same (.7); participate in phone conference with T Moyron M Shinderman, S Maizel regarding Union GUC motions (.4); begin write up make/break analysis re voting for GUC (3.0); phone call with M Zeefe re same (.1); phone call with A Ruegger re same (.2).
07/20/20	S. Alberts	1.70	1,360.00	B300	Conference with T. Moyron about claims objection for voting purposes (.3), conference working group regarding claim objection for plan voting (.6), follow up with E. Bass for drop in on lack of union associational standing (.1), conference with M. Zeefe concerning claim objection for RPHE (.2); communicate by emails (.2), then call with counsel to SEIU about claims voting process (.2) and follow up (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	S. Maizel	0.60	480.00	B300	Telephone conference with T. Moyron re determination motions (.2); telephone conference with Counsel for UCC re same (.4).
07/20/20	S. Maizel	0.30	240.00	B300	Telephone conference with Paul Pascuzzi re Toyon claims.
07/20/20	J.A. Moe, II	0.30	179.78	B300	/Toyon Associates/ Telephone call with Paul Pascuzzi, Sam Maizel and Tania Moyron on Toyon's Claim and possible Administrative Claim, and determining the amount of the Claim.
07/20/20	J.A. Moe, II	0.10	59.93	B300	In regard to the amount of Administrative Claims in connection with the Plan, confer with Karleen Murphy on updated Chart on amount of payments due in regard to the SIR, and total amount of that potential amount.
07/20/20	M. Zeefe	1.30	624.33	B300	Emails with S. Alberts re union claims (0.1); call with S. Alberts re RPHE claims (0.1); call and emails with C. Montgomery re SEIU claims (0.2); draft determination motion re Allscripts claims for voting purposes (0.9).
07/21/20	T. Moyron	0.30	179.78	B300	Analyze matters related to status of RPHE claim (.2); prepare correspondence regarding same (.1).
07/21/20	J.A. Moe, II	0.20	119.85	B300	In regard to the amount of the Administrative Claims in connection with the proposed Plan: Respond to text from Tania Moyron on Claim filed by the NLRB, reviewing the Lists of Administrative Claims, then review the Docket, then transmit newly filed NLRB Claim to Tania Moyron.
07/21/20	C. Montgomery	7.20	5,760.00	B300	Communications with T. Moyron and J. Garfinkel regarding Allscripts claims (.1); Communications with M. Zeefe regarding Allscripts claim reduction for voting purposes (2.0); continue draft best case voting analysis for GUC (5.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	J.A. Moe, II	0.20	119.85	B300	In regard to the amount of Administrative Claims in connection with the Plan, review Chart on fees and expenses and E-Mail to Kathryn Howard on updating the Chart for discussion on July 22nd (.10); telephone call to Kathryn Howard on updating Chart and Notice on May's Monthly Fees (.10).
07/21/20	M. Zeefe	8.10	3,890.03	B300	Emails re RPHE claims with S. Alberts and T. Moyron (0.3); draft determination motion re Allscripts claim (6.8); research re same (1.0).
07/22/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review E-Mails on amount of SIR Claims, and E-Mail to Tania Moyron transmitting Chart on SIR Claims and the amount of those Claims.
07/22/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call with Jon Emerson on overall analysis on the amount of Claims.
07/22/20	M. Zeefe	0.80	384.20	B300	Review comments to determination motion re Allscripts claim (0.1); call with J. Garfinkel, S. Maizel, T. Moyron re same (0.2); team call re GUC claims (0.5).
07/22/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, confer with Kathryn Howard and later review updated Chart on administrative fees and costs.
07/22/20	T. Moyron	0.50	299.63	B300	Call with H. Kevane and then Mintz re AppleCare and risk pool claims re administrative bar date.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	C. Montgomery	2.50	2,000.00	B300	Communications with M Zeefe re Allscripts (.1); review and comment on Allscripts Determination Motion (1.2); communications with S Alberts regarding SEIU voting conversation (.1) ; participate in conference call re plan voting with T Moyron , S Alberts, N Koffroth (.5); communications with S Alberts, J Moe and T Moyron regarding SEIU voting (.1); communications with S Maizel regarding Swinerton Voting (.1) ; communications with T Moyron re BASM objection (.4)
07/22/20	S. Alberts	2.00	1,600.00	B300	Emails (.2) and conference with working group about potential union and RPHE claims objections (.5), conference with BRG regarding potential union settlements and claims (.6), conference with SEIU about support of plan and related matters (.3) and follow up on SEIU employee voting question (.2), report to working group (.2).
07/23/20	N. Koffroth	0.40	200.60	B300	Participate in call with counsel to Committee re potential designation issues
07/23/20	J.A. Moe, II	0.10	59.93	B300	In regard to the confirmation of the Plan, review exchanges of E-Mail with Henry Kevane, Claude Montgomery, Steven Kahn and Tania Moyron on Objections to Claims and the Plan.
07/24/20	C. Montgomery	0.10	80.00	B300	Communications with C. Whitmore regarding administrative claims bar date.
07/24/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review Paul Glassman's E-Mail on Claim asserted by Long Beach Memorial Medical Center.
07/27/20	S. Alberts	2.20	1,760.00	B300	Review background materials (.3) and draft proposed communication to RPHE seeking potential settlement (.6), communicate with T. Connor about 2019 RPHE balance due (.2) and with WTW about 2020 (.2), follow up with co-counsel RPHE contact info (.1), about receive comments and revise proposed communications and send back internally with two options (.4); communication about SEIU alleged administrative grievance claims (.2), review claims and follow up communications (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	S. Maizel	0.30	240.00	B300	Review SGM motion re admin expense.
07/27/20	T. Moyron	0.30	179.78	B300	Correspond with M. Zeefe re claims.
07/27/20	T. Moyron	0.20	119.85	B300	Analyze correspondence from P. Saba re admin stipulation (.1); respond to same and prepare email to other co-plan proponents (.1).
07/27/20	R. Richards	0.30	216.90	B300	Follow up emails re open admin and large unsecured claims.
07/27/20	T. Moyron	2.00	1,198.50	B300	Analyze correspondence from A. Ruda, et al. re SEIU claims (.3); prepare correspondence regarding same (.1); analyze correspondence regarding RPHE from S. Alberts, et al. (.2); prepare correspondence to R. Adcock re same (.1); follow up correspondence regarding same (.1); conference call with J. Schlant re administrative claims (.1); analyze email from J. Schlant re administrative claims (.1); analyze claims set forth in excel charts (.2); correspond re same (.2); Analyze P. Anderson, et al., emails re stipulation and call (.2); conference call with P. Anderson, R. Millner, et al. re OR stipulation (.3); call with R. Millner re same (.1).
07/27/20	T. Moyron	0.20	119.85	B300	Analyze T. Conner, et al. correspondence re RPHE.
07/27/20	M. Zeefe	0.90	432.23	B300	Emails re RPHE, SEIU, and L39 (0.8); call with T. Moyron re same (0.1).
07/27/20	C. Montgomery	1.40	1,120.00	B300	Communications with P Saba and T Moyron regarding Administrative claim bar date stipulation (.1) Communications with T Moyron: regarding SEIU class action (.2); communications with J Moe regarding 503(b)(9) claims (.2); communications with S Alberts, T Moyron, S Maizel regarding RPHE claims and plan settlement (.2) ; phone call with S Maizel regarding Swinerton plan objections and claim settlement (.3); communications regarding updated computations regarding Swinerton (.3); phone call with J Schlant regarding Swinerton prepayment issue (.1)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	A. Ruegger	1.30	1,040.00	B300	Communications with Dentons team re SEIU grievance and SGM admin. claim, and responses thereto.
07/27/20	J.A. Moe, II	0.50	299.63	B300	In regard to the review of Administrative Claims in connection with the Plan, E-Mail to Jon Emerson on withdrawals of multiple Claims, both Administrative and large general unsecured claims (.20); telephone call to Mr. Emerson on accounting for Administrative Claims (.20); telephone call to John Schlant on Administrative Claims (.10).
07/27/20	J.A. Moe, II	0.20	119.85	B300	/Old Republic/ inquiry on attachments to Old Republic's Proofs of Claim, confer with Peg Anderson, and review and identify Addenda previously sent by Ms. Anderson, and transmit to Robert Millner.
07/28/20	S. Maizel	0.20	160.00	B300	Review and respond to emails re Swinerton admin expense issues.
07/28/20	K.M. Howard	0.40	100.30	B300	Analysis of stipulation to extend administrative claims bar date for AppleCare and reviewed and revised Critical Dates Memorandum.
07/28/20	K.M. Howard	0.40	100.30	B300	Analysis of stipulation to continue administrative claim bar date for NantWorks and reviewed and revised Critical Dates Memorandum.
07/28/20	K.M. Howard	0.40	100.30	B300	Analysis of stipulation between Debtors and note trustees and MOB Lenders extending deadline to file administrative expense claim and reviewed and revised Critical Dates Memorandum.
07/28/20	K.M. Howard	2.20	551.65	B300	Reviewed and assembled voluminous administrative expense claims including review and preparing index of claims.
07/28/20	K.M. Howard	0.10	25.08	B300	Email exchanges with T. Moyron regarding administrative expense claims.
07/28/20	K.M. Howard	0.20	50.15	B300	Analysis of SGM's Notice of Administrative Expense Claim and prepared email to Verity Team.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	A. Ruegger	0.90	720.00	B300	Review SGM admin. Claim (0.2); teleconference with Dentons team re responses to SEIU grievance (0.3) and RPHE motion (0.2); communications with Dentons team re legal issues re SGM admin claim (0.2).
07/28/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of Administrative Claims in connection with the Plan, consider the Claim and Order filed by Parallon Revenue Cycle Services , and E-Mail returned to Tania Moyron on Claim and Order (.10); telephone call returned from Jon Emerson on validity of Claim and whether any amount is due (10); review Notice Of Bar Date (.10).
07/28/20	J.A. Moe, II	0.50	299.63	B300	In regard to the review of Administrative Claims in regard to the Plan, review notice of proposed Order and Motion on allowance of an Administrative Claim filed by Parallon (.20); research Motion and Order, and fact of filing (.20); telephone call to Jon Emerson on Parallon's Claim (.10);
07/28/20	M. Zeefe	1.90	912.48	B300	Draft order approving RPHE agreement rejection (0.2); team call re administrative claims (0.5); emails re same (0.1); call with T. Moyron re same (0.2); draft and circulate order approving PBGC settlement (0.9).
07/28/20	T. Moyron	0.50	299.63	B300	Conference call with S. Alberts, et al. re SEIU asserted claims and related matters.
07/28/20	T. Moyron	0.60	359.55	B300	Analyze 2015, 2017, MOB stipulation (.1); analyze Nant equipment stipulation (.1); conference call with P. Saba re same (.1); analyze final versions for filing with Court (.1); analyze 2005s stipulation (.1); exchange emails with Mintz re same (.1); re administrative claims.
07/28/20	N. Koffroth	2.10	1,053.15	B300	Research statutory and case law re withdrawal of reference concerning claims estimation

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	N. Koffroth	1.10	551.65	B300	Draft stipulations and orders extending administrative claims bar date re NantWorks (0.3) and US Bank/MOB Lenders (0.3); extending confirmation objection deadlines re the Chubb Companies (0.3) and GRM (0.2)
07/28/20	C. Montgomery	0.50	400.00	B300	Participate in conference call with S Alberts, T Moyron, M Zeefe , A Ruegger regarding SEIU grievance claim estimation.
07/28/20	C. Montgomery	2.80	2,240.00	B300	Communications and phone conference with S Alberts, M Zeefe and T Moyron regarding RPHE claim settlement (.3); phone call with J Emerson regarding Swinerton mechanics lien objection (.1); communications with S Maizel re same (.1); communications with D Galfus regarding RPHE settlement issues (.1); communications regarding draft order re RPHE trust agreement rejection (.2); communications with J Emerson and P Chadwick regarding Swinerton (.3); communications with T Moyron regarding SGM administrative expense claim (.1); review same and plan (.7); participate in phone conference with T Moyron, D Bleck, P Ricotta, M Shinderman, S Maizel regarding SGM administrative claim issues (.8); follow up call with T Moyron re same (.1)
07/29/20	C. Montgomery	1.20	960.00	B300	Review information re SGM administrative claim and plan objection (.4) communications with P Chadwick and T Moyron regarding voting claims summary (.1) Communications with T Moyron, S Alberts and M Zeefe regarding RPHE claims settlement (.1) ; communications with P Chadwick and J Schlant regarding Swinerton mechanics lien claim settlement and plan resolution (.2); communications with R Adcock regarding SGM administrative claim issues (.2); phone call S Maizel regarding Swinerton Mechanics lien issues (.2)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review exchange of E-Mails with Bob Richards and Tania Moyron on estimation, objection, and/or resolution of Claims.
07/29/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, confer with Karleen Murphy on updating SIR Analysis (.10); identify and review Chart on assignments of responsibility over Administrative Claims (.10).
07/29/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan: Review E-Mails on Toyon Associates Claim and review Jon Emerson's analysis of amounts due Toyon.
07/29/20	J.A. Moe, II	0.90	539.33	B300	In regard to the review of Administrative Claims in connection with the Plan, review John Schlant's analysis of Claims, then join conference call with John Schlant, Robert Richards, Malka Zeefe and Tania Moyron, on Administrative Claims (.70); telephone call with John Schlant on underlying Charts supporting current Master Chart (.20).
07/29/20	N. Koffroth	0.60	300.90	B300	Participate in call with P. Chadwick, J. Schlant, et al. re claims reconciliation
07/29/20	K.M. Howard	0.40	100.30	B300	Analysis of stipulation extending deadlines for GRM to file administrative claim and reviewed and revised Critical Dates Memorandum.
07/29/20	K.M. Howard	0.20	50.15	B300	Reviewed motions administrative expense claims and email exchanges with T. Moyron regarding objection deadlines.
07/29/20	K.M. Howard	2.90	727.18	B300	Analysis and assembly of voluminous motions for administrative expense claims and prepared chart of same.
07/29/20	S. Maizel	0.40	320.00	B300	Review and respond to emails re Swinerton secured claim.
07/29/20	R. Richards	0.80	578.40	B300	Review draft of admin claim summary chart (0.2); send updated status to Jon Emerson on my claims (0.2); conference call re claims (0.4).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	K. Murphy	0.20	83.30	B300	Telephone call with John Moe re revision to SIR for Harris (.1); and prepare further revisions to Verity Chart with new total calculation (.1).
07/29/20	T. Moyron	0.30	179.78	B300	Analyze matters related to RPHE settlement (.2); exchange emails with counsel for RPHE (.1).
07/29/20	T. Moyron	4.10	2,456.93	B300	Conference call with BRG, J. Moe, et al. re admin claims (.5); analyze plan provisions related to administrative claims (.8); analyze case law related to 1129 and matters related to admin claims (1.6); prepare correspondence to Milbank and Mintz (.3); analyze CIGNA admin claim (.1); analyze additional admin claim requests (.6); analyze administrative claim analysis (.2).
07/29/20	G. Medina	0.50	146.63	B300	Review and file Stipulation upload order with Verity and UMB Bank, N.A. and Wells Fargo Bank, National Association, Extending Time To File Administrative Expense Claims download and send to team.
07/30/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call to Amir Gamliel on Parallon's Claim and proposed Order.
07/30/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims, review Nick Pascuzzi's detailed E-Mail on basis for, responding to and reaching agreement on Toyon's Claim.
07/30/20	N. Koffroth	1.10	551.65	B300	Participate in call with P. Chadwick, K. Owens, et al. re GRM issues (0.3); participate in call with R. Richards and K. Owens re GRM issues (0.3); participate in call with H. Kevane, et al. re health plan issues (0.5)
07/30/20	M. Zeefe	2.00	960.50	B300	Emails re CNA claims (0.1); call with RPHE, BRG, Dentons re RPHE administrative claim (0.7); follow up call with BRG and Dentons re same (0.4); call re labor-related claims (0.8).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	K.M. Howard	1.60	401.20	B300	Finalize assembly and organization of administrative expense claims and prepared chart.
07/30/20	G. Medina	0.60	175.95	B300	Review request from B. Richards and pull all GRM claims filed.
07/30/20	C. Montgomery	2.20	1,760.00	B300	Participate in conference call regarding settlement of RPHE Plan issues (.7); follow up call with T Moyron, D Galfus, S Alberts re same (.4); participate in phone conference with S Alberts, M Zeefe, T Moyron regarding union and RPHE claim resolution issues for confirmation (.5); communications with T Moyron and H Kevane regarding United Healthcare stipulation (.1); review RPHE actuarial valuation and communications with S Alberts re conclusion on areas for settlement (.5)
07/31/20	M. Zeefe	0.90	432.23	B300	Call with BRG and Dentons re administrative claims.
07/31/20	C. Montgomery	0.50	400.00	B300	Continued review RPHE actuarial valuation and communications with S Alberts re conclusion on areas for settlement.
07/31/20	T. Moyron	2.20	1,318.35	B300	Conference call with C. Montgomery re plan matters (.9); analyze related matters with plan and claims (1.3).
07/31/20	K.M. Howard	0.20	50.15	B300	Reviewed and assembled administrative expense claims motions filed by Toyon Associates (.1); prepared email to S. Maizel (.1).
07/31/20	K.M. Howard	1.30	325.98	B300	Organized and finalized filed administrative expense claims (.4); reviewed and revised Administrative Expense Claim Chart (.8); prepared email to Verity Team regarding same (.1).
07/31/20	K.M. Howard	0.40	100.30	B300	Reviewed voluminous orders approving stipulations extending deadlines for parties to file administrative expense claims and reconciled each with Critical Dates Memorandum.
07/31/20	N. Koffroth	0.90	451.35	B300	Participate in call with R. Richards, J. Schlant, et al. re claims reconciliation

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	N. Koffroth	0.20	100.30	B300	Conference call with T. Moyron re administrative claims
07/31/20	R. Richards	3.60	2,602.80	B300	Review corporate comments on Stock Purchase Agreement (0.2); call and email re insurance issues with Ty Connor (0.2) and BRG (0.2); review insurance clauses in existing and pending purchase and sale agreements related to tail insurance (1.6); prepare form of Marillac sale order (1.3); follow up on other exhibits for purchase agreement (0.1).
07/31/20	R. Richards	1.30	939.90	B300	Review updated admin claim chart and key attachments (0.8); call re same (0.5).
07/31/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, exchange E-Mails with An Ruda and confer with Karleen Murphy on amount of the reserve for the SIR.
07/31/20	J.A. Moe, II	1.20	719.10	B300	In regard to the review of Administrative Claims in connection with the Plan, conference call with John Emerson, John Schlant, Bob Richards and Malka Zeefe reviewing Administrative Claims identified by BRG (.90); telephone call from and transfer Chart to Malka Zeefe on unliquidated Administrative Claims (10); telephone call with Jon Emerson on updated Chart (.20).
<b>Subtotal</b>		<b>150.50</b>	<b>91,620.15</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	S. Maizel	0.10	80.00	B310	Review and respond to emails re Nant and Integrity claims analysis.
07/06/20	T. Moyron	0.70	419.48	B310	Analyze draft settlement agreement with Central Health Plan of California, Inc., Seoul Medical Group, Inc. and Central Health MSO, Inc. (.3); exchange emails with Pachulski, et al. re same (.1); correspond with J. Moe regarding deadline and stipulation with Phillips Medical (.1); analyze stipulation with Cigna (.1); correspond with Pachulski re same (.1).
07/06/20	N. Koffroth	3.90	1,955.85	B310	Draft analysis of potential objections to certain claims.
07/07/20	N. Koffroth	0.30	150.45	B310	Participate in call with T. Moyron, S. Alberts, et al. re creditor inquiry concerning claim treatment.
07/07/20	M. Zeefe	4.50	2,161.13	B310	Draft summary of Local 39 claims for letter (0.6); review and revise letter (1.0); revise motion to approve settlement with PBGC (2.2); call with D. Galfus re same (0.1); emails with S. Alberts re same (0.1); calls with T. Moyron re same (0.5).
07/09/20	N. Koffroth	0.30	150.45	B310	Participate in conference call with H. Kevane, P. Chadwick, et al. re creditor inquiry re treatment of claim
07/10/20	S. Maizel	0.30	240.00	B310	Review and email T. Moyron re DHCS claim no. 7879.
07/10/20	S. Maizel	0.20	160.00	B310	Review and respond to emails re Integrity claims evaluation.
07/10/20	B. Greer	1.00	800.00	B310	Teleconferences and emails re claims analysis.
07/10/20	D. Pina	0.50	159.38	B310	Communications regarding search for copies of claims (.2); work with KCC on copies of claims for R. Richards and access to claims database maintained on web site (.3).
07/11/20	R. Richards	0.40	289.20	B310	Review large GUC claims for objection.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/11/20	S. Maizel	0.60	480.00	B310	Review and analyze DHCS claim (.5); email to R. Richards re same (.1).
07/12/20	S. Maizel	0.70	560.00	B310	Review and revise D. Thompson claim objection.
07/12/20	R. Richards	1.80	1,301.40	B310	Review Doris Thompson new claim (0.2) and compare to her prior claim (0.1); review prior claims objections related pleadings and order (0.5); prepare objection and supporting declaration to Doris Thompson new claim (1.0).
07/12/20	J.A. Moe, II	0.10	59.93	B310	Preliminarily review Motions, Stipulations and Orders where relief from stay was granted, in regard to Stipulations to be prepared withdrawing large general unsecured claims.
07/13/20	R. Richards	3.10	2,241.30	B310	Review Gerald Kozai proof of claim and exhibits (1.5); confirm other Gerald Kozai filed claims are substantively the same (0.4); review Kathy Kozai proof of claim and exhibits (0.5); confirm other Kathy Kozai filed claims are substantively the same (0.3); email and call with Jon Emerson of BRG re Kozai claims (0.2); review comments on objection to Doris Thompson claim and email re follow up research to Geoff Miller (0.2).
07/13/20	G. Miller	5.00	2,210.00	B310	Revise Doris Thompson claim objection (2); follow up research to support objection to Thompson claim (3).
07/13/20	D. Pina	0.70	223.13	B310	Communications with G. Miller and KCC regarding Doris Thompson Claim (.2); analysis of KCC Claims Register and the Bankruptcy Court's Claims Register regarding duplicate claim (.3); circulate copy of Claim No. 8085 (.2).
07/13/20	J.A. Moe, II	0.10	59.93	B310	Prepare draft of Withdrawal Of Claim in regard to withdrawal of large general unsecured claims, where relief from stay was granted.
07/14/20	G. Miller	1.00	442.00	B310	Research re SERP claims as unsecured claims.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/20	J.A. Moe, II	0.70	419.48	B310	In regard to the elimination of large General Unsecured Claims, review Withdrawal of Anil Jain's Claim and Stipulation on Mediation of Irene Rodriguez Claim (.10); prepare Withdrawal of Claim for Irene Rodriguez (.20); research background on Ivonne Engelman and Rosa Carcamo for Withdrawal (.20); prepare drafts of the Withdrawals Of Claims (.20).
07/15/20	D. Pina	7.20	2,295.00	B310	Communications with R. Richards regarding potential claims objections (.1); download and analyze updated copies of the Claims Registers maintained by the Bankruptcy Court and KCC (.7); provide R. Richards with claim information for creditors Doris Thompson and Raquel Joseph (.5); related follow-up communications and distribute copies of Claims Registers and claims (.4); telephone conference with A. Estrada from KCC and the Clerk's Office regarding claims processing procedures and related arrangements agreed to between the court and the claims agent (1.1); communications regarding logistics for the claims reconciliation process (.3); communications with R. Richards regarding conference details (.2); review and revise draft objections to claims (.7); prepare exhibits to motions and prepare copies of R. Adcock supporting declaration for execution (.4); review local rules and forms and prepare mandatory cover sheets for D. Thompson and R. Joseph claims objections (.7); assemble and finalize D. Thompson and R. Joseph claims objections and prepare for electronic filing (.7); circulate to T. Moyron for final approval (.1); further edits to R. Joseph claims objection and prepare for electronic filing (.6); electronically file and distribute copies of papers (.5); coordinate service with KCC (.2).
07/15/20	G. Medina	0.20	58.65	B310	Review claims motion prepared by B. Richards and filed by D. Pina (0.1); Call with T. Moyron regarding Claims motions and filing (0.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/20	R. Richards	1.30	939.90	B310	Work on finalizing objection to Doris Thompson claim (0.5); work on finalizing objection to Raquel Joseph claim (0.5); email and call with California Tax re amended tax claims (0.2); follow up on US Foods administrative claim (0.1).
07/15/20	J.A. Moe, II	0.20	119.85	B310	In regard to the administration of Claims, prepare initial draft of the Withdrawal Of Claim for Ok Ran Ma.
07/16/20	M. Zeefe	4.50	2,161.13	B310	Call with BRG/Dentons re highest general unsecured claims (0.8); circulate email re AHMC claims (0.4); review and analyze Allscripts claims (2.8); circulate union claims and summaries (0.5).
07/16/20	K.M. Howard	0.40	100.30	B310	Analysis of Claim filed by Raquel Joseph and Objection thereto and reviewed and revised Critical Dates Memorandum.
07/16/20	K.M. Howard	0.40	100.30	B310	Analysis of Claim filed by Doris Thompson and Objection thereto and reviewed and revised Critical Dates Memorandum.
07/16/20	R. Richards	0.20	144.60	B310	Review docket; prepare form of Order approving Vazquez stipulation.
07/16/20	A. Ruegger	0.30	240.00	B310	Communications with T. Moyron re responding to union claims.
07/17/20	A. Ruegger	1.40	1,120.00	B310	Review M. Zeefe analysis of union claims (0.2); [REDACTED]
07/17/20	M. Zeefe	1.50	720.38	B310	Emails re Allscripts claims (0.2); team call re union and Allscripts claims (1.3).
07/17/20	K.M. Howard	0.20	50.15	B310	Conferred with J. Moe regarding JRG's claim.
07/17/20	P. Maxcy	1.50	1,109.25	B310	Review Cardinal and other settlement agreements and related information re releases.
07/19/20	M. Zeefe	0.30	144.08	B310	Emails with A. Ruegger re union claims
07/22/20	J.A. Moe, II	0.30	179.78	B310	In regard to the reduction of general unsecured claims, and in accordance with exchange of E-Mails with Joel Glaser on July 21st, prepare draft of the Stipulation withdrawing Claim of Mesha Sanford.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	J.A. Moe, II	0.50	299.63	B310	In regard to the reduction of large general unsecured claims, review the draft Stipulation on Withdrawal Of Claim of Mesha Sanford, then revise the first draft of the Stipulation (.20); revise second draft of the Stipulation (.20); E-Mail to Andres Estrada on Claim filed by Mesha Sanford (.10).
07/23/20	J.A. Moe, II	0.60	359.55	B310	In regard to the reduction of large general unsecured claims, telephone call with Sam Parks, Jesse Palmer and Karleen Murphy, joined by Elspeth Paul, on status of and likely result on resolution of Data Breach Claims (.40); confer with Karleen Murphy and review name of Data Breach Plaintiffs (.10); E-Mail to Andres Estrada on Ballots sent to Class 10 Claimants (.10).
07/27/20	K. Murphy	0.20	83.30	B310	/ Lara/Johns / Telephone call with John Moe re discussion date of data breach at issue (.1); and draft emails to John Moe enclosing requesting information re same. (.1).
07/27/20	K.M. Howard	0.30	75.23	B310	Reviewed court's notice setting the hearing on Debtors' objections to Claim #6194 filed by Claimant Raquel Joseph and Claim #8085, determined objection/reply deadlines and reviewed and revised Critical Dates Memorandum.
07/27/20	J.A. Moe, II	0.20	119.85	B310	/Wage Hour Claims/ Telephone call from Elina Tilman on conference on Claims, exchange E-Mails with Tania Moyron and confer with Ms. Tilman on issues on such Claims.
07/28/20	J.A. Moe, II	0.20	119.85	B310	In regard to the reduction of large general unsecured claims, review the Motion For Relief From Stay filed by Jason Shank as to VHS, the Response and Order, and determination on Withdrawal Of Claim.
07/29/20	M. Zeefe	0.60	288.15	B310	Conference call re claims.
07/30/20	D. Pina	0.40	127.50	B310	Assist B. Richards with copies of claims.
<b>Subtotal</b>		<b>48.90</b>	<b>25,519.54</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	T. Moyron	0.60	359.55	B320	Conference call with N. Koffroth regarding DS order, changes, ballots, etc. re distribution.
07/01/20	R. Richards	1.50	1,084.50	B320	Review current draft of Chapter 11 plan (1.1) and Liquidating Trust Agreement (0.4).
07/01/20	T. Moyron	0.60	359.55	B320	Further correspond with Committee counsel and review proposed language attachment re objections to claims (.2); prepare email to Committee counsel (.1); prepare email to R. Adcock, et al. re same (.1); analyze final language and correspond regarding ballots (.2).
07/01/20	C. Montgomery	0.70	560.00	B320	Participate in phone conference with KCC, T Moyron, J Moe and N Koffroth regarding ballots and claim voting issues (.6); phone call with J Moe re same (.1)
07/01/20	C. Montgomery	2.60	2,080.00	B320	Communications with T Moyron, J Moe, M Shinderman regarding ballots, claims objections and requested plan changes (.4); phone call with T Moyron re same (.1); phone call with J Moe re same (.1); review disclosure statement order and suggest revisions to same to N Koffroth (.8); review Milbank ballot language and comment on same (.5); phone call with J Behrens and J Moe re same (.6); communications with N Koffroth and T Moyron regarding disclosure order and tomorrow's hearing (.1)
07/01/20	J.A. Moe, II	0.60	359.55	B320	Conference telephone call with Dentons and KCC personnel, addressing issues in connection with the Ballots, then discuss timeline for the Solicitation Package, then review documents required to be filed and served.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	J.A. Moe, II	1.60	958.80	B320	In regard to the Ballots: Exchange multiple E-Mails with Claude Montgomery and Tania Moyron, and telephone call with Mr. Montgomery on, and revise page 4, section d, of the Ballot, for 9 of 11 Ballots, then create and exchange redline versions of the revisions (1.40); review Class 4 Ballots for references to Movants (.20);
07/01/20	J.A. Moe, II	0.20	119.85	B320	In regard to Class 10 Ballots, review List of Class 10 Ballots, then telephone call and E-Mail to Nam Nguyen.
07/01/20	S. Maizel	0.60	480.00	B320	Telephone conference with UCC counsel, John Moe, etc. re ballots issues.
07/01/20	S. Maizel	0.60	480.00	B320	Telephone conference with BRG, etc. re restricted funds treatment in plan (.4); telephone conference with R. Adcock, etc. re same (.2).
07/01/20	S. Maizel	0.50	400.00	B320	Review and revise draft order granting motion to approve disclosure statement.
07/01/20	S. Maizel	0.50	400.00	B320	Review and respond to emails from K. Wang re disclosure statement issues.
07/01/20	K. Murphy	0.30	124.95	B320	Analyze response email from Andres Estrada from KCC with results of Proof of Claim searches for various individuals for purposes of preparing chart of Updated List for Class 9 Ballots (.1); prepare update to Verity Charts on Proofs of Claims (.1); and draft email to John Moe re the same (.1).
07/01/20	K.M. Howard	0.80	200.60	B320	Analysis of Judge Robles' Tentative Ruling approving Debtors' Disclosure Statement and Voting Procedures and reviewed and revised Critical Dates Memorandum.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	J.A. Moe, II	3.20	1,917.60	B320	In regard to continuing work on the Ballots: Review Claude Montgomery's comments on James Behrens' terms' comments on page 4 section (d) of the Ballots (.10); telephone calls with James Behrens and telephone call with Claude Montgomery on language (.20); extended telephone call with Claude Montgomery, James Behrens and Sam Maizel on language for page 4, section (d) of the Ballots (.60); await James Behrens's comments on page 4 section (d) of the Ballots, and prepare revised draft Ballot (.90); review James Behrens revised proposed Ballot and exchange E-Mails with Claude Montgomery and Tania Moyron on revised Ballot (.30); review additional iteration of the Ballot form James Behrens, and exchange E-Mails with Mr. Montgomery and Ms. Moyron on the Ballot (.30); telephone call to James Behrens on review of revised insert (.10); prepare insert, obtain internal approval the transmit to James Behrens and receive Committee approval (.40); instruction on proceeding with the Ballots and transmit to Dentons, Verity and BRG the Ballots (.30).
07/01/20	J.A. Moe, II	0.10	59.93	B320	In regard to the Disclosure Statement (and the Plan of Liquidation), preliminarily review the Court's Tentative Ruling.
07/01/20	T. Moyron	0.60	359.55	B320	Analyze matters related to DHCS request re disclosure statement (.2); analyze matters in connection with ballots (.2); analyze correspondence with Jones Day (.2).
07/02/20	J.A. Moe, II	3.20	1,917.60	B320	In regard to the Ballots, telephone call from Tania Moyron on necessity to completely revise the Class 3 Ballots (.10); review E-Mails from McDermott Will & Emery, then E-Mail and telephone call to Andres Estrada, and E-Mail to and telephone call with Dave Hartie on Dentons revising the Class 3 Ballot (.40); commence work reviewing the Class 4 Ballot for transposition (.20); telephone call to Dave Hartie on Exhibit, and E-Mail to Mr. Hartie on use of placeholder (.30); revise and await the single Class 3 Ballot into a two

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					part Class 3 Ballot (1.20); review E-Mail for Dave Hartie on information for the Exhibits, and create Exhibit (.10); review the first iteration of the new Class 3 Ballots, and necessity to add Exhibits (.10); final review of Class 3 Ballots, Derry Kalve and Dave Hartie, and telephone call with Messrs. Kalve and Hartie on revisions (.60); transmit Ballots to Nick Koffroth and to Andres Estrada, and telephone call to Mr. Estrada on completing the Ballots (.20).
07/02/20	J.A. Moe, II	0.20	119.85	B320	Exchange E-Mails (on July 1st) with Tania Moyron on publication of Notices in regard to the Disclosure Statement and Administrative Claims Bar Date (.10); telephone call to Kathryn Howard on publication of Notices (.10).
07/02/20	J.A. Moe, II	0.60	359.55	B320	In regard to the Ballots, note newly filed Second Amended Plan and Disclosure Statement (.20); telephone call returned from Tania Moyron and telephone calls to and from Nick Koffroth on changing Ballots to reflect newly filed Plan and Statement (.20) telephone call to Andres Estrada on necessity to revise first page of each Ballot to reflect newly filed Plan and Disclosure Statement with Docket Number (.20).
07/02/20	J.A. Moe, II	1.60	958.80	B320	In regard to the Ballots, review James Behrens' E-Mail and E-Mail to and telephone call from Tania Moyron on new insert from Jones Day (.10); revise eight of ten Ballots, quickly review Ballots, make one change and forward to Nick Koffroth to include with the filing on July 2nd (1.10); final review of Ballots, complete two revisions, and transmit final set of Ballots to Nick Koffroth (.30); transmit successive sets of Ballots to Andres Estrada (.10).
07/02/20	S. Maizel	0.50	400.00	B320	Telephone conference with Mintz Levin, UCC Counsel, etc. re pending issues.
07/02/20	S. Maizel	0.20	160.00	B320	Review and revise draft order granting motion to approve disclosure statement.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	K.M. Howard	1.60	401.20	B320	Analysis of Order Granting Joint Motion for Approval of Disclosure Statement, Solicitation and Voting Procedures, and Objection Procedures for Confirmation of Amended Plan and reviewed and revised Critical Case Memorandum accordingly.
07/02/20	C. Montgomery	3.00	2,400.00	B320	Communications with T Moyron. M Shinderman and P Ricotta regarding disclosure order and proposed changes (1.5); participate in plan conference call with M Shinderman D Bleck, P Chadwick, S Maizel, T Moyron, re preferences (.5); follow up communications with T Moyron and N Koffroth regarding administrative expense bar date (.3); review Disclosure order changes and confer with T Moyron (.5); communications regarding pursuit of preference claims under the plan (.2)
07/02/20	T. Moyron	5.20	3,116.10	B320	Analyze, prepare and finalize order and updated orders re DS (1.1); analyze all related comments (.5); analyze Milbank, Mintz, et al. emails (.4); prepare emails to Mintz, et al. re same (.3); analyze final versions of ballots (.6); analyze KCC correspondence (.3); analyze Coco, et al. correspondence and respond to same (.6); analyze amended DS and plan and redlines (1.3); conference calls with Chambers re DS, lodgment of order, etc. (.1).
07/02/20	N. Koffroth	8.40	4,212.60	B320	Draft plan of liquidation (0.7); draft disclosure statement (0.8); draft order granting disclosure statement motion (2.7); draft supplemental notice in support of disclosure statement motion (2.6); draft and finalize solicitation package notices (1.6)
07/03/20	T. Moyron	0.70	419.48	B320	Conference call with JD, Milbank, Mintz, Dentons re Nant and potential settlement (.2); exchange emails re analysis (.2); call with S. Maizel regarding same (.3).
07/03/20	T. Moyron	0.10	59.93	B320	Analyze correspondence from KCC re ballots.
07/03/20	S. Maizel	0.20	160.00	B320	Telephone conference with Creditors' Committee counsel, Mintz Levin, etc. re plan issues.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/03/20	S. Maizel	0.50	400.00	B320	Telephone conference with T. Moyron (X2) re plan issues.
07/03/20	J.A. Moe, II	3.00	1,797.75	B320	In regard to the Ballots, exchange E-Mails with Andres Estrada on review of the last set of revisions and inserts to the Ballots (.10); review the Ballots and note required revisions, then perform second review of the Ballots to confirm required revisions (1.90); telephone call with Andres Estrada on seven revisions to the Ballots (.30); review next set of revised Ballots received from Andres Estrada and note one last revision to second Class 4 Ballot (.30); E-Mail to and telephone call with Mr. Estrada on one additional revision to the second Class 4 Ballot (.20); review Andres Estrada's E-Mail, and telephone call to Mr. Estrada reviewing last revision to the second Class 4 Ballot (.20).
07/04/20	C. Montgomery	1.00	800.00	B320	Communications with T Moyron regarding Blue Mountain presentation and review of same (.8) ; communications with T Moyron regarding prior Integrity Analysis (.2)
07/06/20	R. Richards	3.40	2,458.20	B320	Review cumulative redline of plan changes (0.8); revise Liquidating Trust Agreement (2.6).
07/06/20	S. Maizel	0.10	80.00	B320	Telephone conference with T. Moyron re plan issues.
07/06/20	N. Koffroth	1.80	902.70	B320	Draft plan settlement
07/07/20	N. Koffroth	0.90	451.35	B320	Draft plan settlement
07/07/20	J.A. Moe, II	0.80	479.40	B320	In regard to the service of the Notice Of Approval Of The Disclosure Statement, review the Notice (.20); review Notice a second time and revise page on Deadline To Vote (.20); telephone call with Andres Estrada on publication of the Notice (.10); prepare detailed E-Mail on three paragraphs in the Order and authority to proceed (.30);
07/07/20	T. Moyron	0.70	419.48	B320	Analyze D. Galfus, et al., correspondence re PBGC motion, etc. (.2); conference call with M. Zeefe re comments to PBGC 9019 motion (.5).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	J.A. Moe, II	0.10	59.93	B320	Telephone call from Elina Tilman discussing the Plan Of Liquidation and administration of Class 9 Claims.
07/07/20	K.M. Howard	0.70	175.53	B320	Reviewed and revised Critical Dates Memorandum to include certain deadlines pertaining to Plan Supplement documents and confirmation documents and prepared emails regarding same.
07/07/20	C. Montgomery	0.90	720.00	B320	Communications with T Moyron regarding liquidating trustee (.1); review notice of administrative bar date (.1); communications with J Moe regarding notice of confirmation(.1); communications with T Moyron P Chadwick and R Adcock regarding Nant Claims (.1) ; phone call with T Moyron regarding plan implementation issues (.3); communications with T Moyron regarding post effective date staffing (.1) communications with P Chadwick regarding Solicitation and Administrative Bar Date Materials (.1)
07/08/20	C. Montgomery	1.70	1,360.00	B320	Phone call with T Moyron regarding plan implementation issues(.2); prepare for and participate in phone conference with T Moyron, J Moe , N Koffroth regarding ballots (.6); communications with T Moyron regarding 2017 notes and other solicitation issues (.7); communications with KCC regarding ballot issues (.2)
07/08/20	J.A. Moe, II	0.30	179.78	B320	In regard to the Notice Of Approval Of Disclosure Statement, E-Mail to Tania Moyron and Nick Koffroth transmitting proposed change to the Notice and inquiry on proceeding with change or serving as filed with the Court (.20); telephone call with Andres Estrada on published Notices and cost (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/20	J.A. Moe, II	1.10	659.18	B320	In regard to Class 2 and the RPHE, review Andres Estrada's and Tania Moyron's E-Mails and telephone call to Nick Koffroth on obtaining answers to two questions (.1); exchange multiple E-Mails with Ms. Moyron, Mr. Koffroth, Sam Alberts and Claude Montgomery on two issues, and scheduling conference call to resolve questions (.3); review exchange of E-Mails with Messrs. Montgomery and Estrada, on RPHE (.1); conference telephone call with Tania Moyron, Claude Montgomery, Sam Alberts and Sam Maizel on answers to KCC's inquiries (.3); telephone call to Andres Estrada on how to prepare Ballots being delivered to Jones Day (.1); in regard to the RPHE, exchange multiple E-Mails with Claude Montgomery and telephone call with Mr Montgomery on Ballot (.2).
07/08/20	N. Koffroth	5.30	2,657.95	B320	Draft plan settlement
07/08/20	N. Koffroth	0.30	150.45	B320	Participate in internal call re solicitation issues
07/08/20	S. Maizel	0.80	640.00	B320	Telephone conference with D. Galfus, etc. re liquidating trustee selection.
07/08/20	T. Moyron	0.80	479.40	B320	Internal call regarding RPHE and KCC inquiries (.3); conference call with C. Montgomery regarding same (.2); correspond with KCC, et al. re same (.3).
07/08/20	T. Moyron	1.80	1,078.65	B320	Correspond with PBGC (.2); analyze open issue and settlement re PBGC (.2); analyze list of major claims in connection with voting deadline (.4); analyze correspondence from KCC, et al. and related matters re solicitation materials (.6); correspond with counsel for Prime re Plan provisions (.2); correspond with Committee counsel re same (.1); call with D. Bleck re same and other matters (.1).
07/09/20	T. Moyron	0.60	359.55	B320	Analyze correspondence and publication of notice of confirmation (.2); call with J. Moe (.1); analyze issues related to ballots and related correspondence (.3).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	T. Moyron	1.50	898.88	B320	Conference call with D. Galfus re plan matters, LT and wind-up (.4), (.3); calls with Mintz re plan matters (.3), (.3); analyze plan provisions re budget (.2).
07/09/20	T. Moyron	0.60	359.55	B320	Analyze matters related to Old Republic requests, analysis and correspondence.
07/09/20	N. Koffroth	4.20	2,106.30	B320	Draft plan settlement
07/09/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan confirmation issues.
07/09/20	J.A. Moe, II	1.50	898.88	B320	In regard to publication of the Notice Of Approval Of The Disclosure Statement, exchange E-Mails with Tania Moyron on review of the proposed Notice (.10); review the proposed Notice for publication (.50); E-Mail to Dentons' Attorneys on review of the proposed Notice for publication, also reviewing section 9 of the Plan (.20); Internal E-Mail on review of the proposed Notice (.10); telephone call from Andres Estrada on change in format to the Notice (.10); E-Mail on review of proposed Notice, retransmit the Notice to Tania Moyron, and telephone call with Ms. Moyron on one deletion (.20); telephone call with Andres Estrada on deletion (.10); review revised Notice, obtain approval and telephone call to Andres Estrada on approval (.20).
07/09/20	J.A. Moe, II	0.30	179.78	B320	In regard to voting on the Plan, telephone call returned from Connie Andonian on request for Ballots for Nephew & Smith (.10); review detailed E-Mail from Ms. Andonian on Claims, and E-Mail to and telephone discussing with Andres Estrada the transmission of Ballots (.20).
07/09/20	J.A. Moe, II	0.10	59.93	B320	In regard to the Plan Of Liquidation, consider revision to description of Class 9 Claims and E-Mail to Tania Moyron and Nick Koffroth on change in treatment of Class 9 Claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	C. Montgomery	3.10	2,480.00	B320	Communications with T Moyron regarding RPHE ballot (.2); communications with R Millner and T Moyron regarding plan language and Verity Old Republic issues and insurance settlements (1.5); communications with T Moyron regarding unliquidated claim voting issues (.1); phone conference with S Maizel, T Moyron and S Alberts regarding final case push (.6); follow up call with T Moyron regarding same (.4); phone call with S Maizel regarding same (.3)
07/10/20	C. Montgomery	0.50	400.00	B320	Communications with T Moyron, S Maizel regarding Verity - Integrity memo and supporting information (.2); communications with T Moyron S Maizel and N Koffroth regarding Plan Settlement (.3);
07/10/20	T. Moyron	1.40	838.95	B320	Conference call with N. Koffroth re plan documents and project memo (.5); follow up call N. Koffroth re determination motions and plan matters (.9).
07/10/20	N. Koffroth	1.40	702.10	B320	Internal calls with T. Moyron re plan issues x2 (0.5) (0.9)
07/12/20	C. Montgomery	4.90	3,920.00	B320	Review draft plan settlement and suggest revisions to same.
07/13/20	C. Montgomery	0.90	720.00	B320	Phone calls with T. Moyron regarding Liquidating Trustee selection process (.3); phone conference with M. Shinderman, R. Richards, S. Maizel, .D Bleck, J. Behrens, T. Moyron regarding Integrity Recovery under plan (.6)
07/13/20	C. Montgomery	0.30	240.00	B320	Additional phone calls with T Moyron regarding liquidating trustee selection.
07/13/20	T. Moyron	0.80	479.40	B320	Conference call with D. Bleck re plan matters (.2); conference call with C. Montgomery re plan matters (.2); conference call with D. Galfus re plan matters (.2); conference call with S. Maizel re plan matters (.2).
07/13/20	N. Koffroth	0.40	200.60	B320	Draft plan settlement
07/13/20	S. Maizel	0.60	480.00	B320	Telephone conference with UCC counsel re Integrity issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

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07/13/20	S. Maizel	0.10	80.00	B320	Telephone conference with T. Moyron re liquidating trustee selection issues.
07/14/20	R. Richards	0.30	216.90	B320	Revise Liquidating Trust Agreement an emails re same.
07/14/20	C. Montgomery	0.90	720.00	B320	Communications with T Moyron regarding liquidating trustee (.1); communications with T Moyron and R Richards regarding Trust agreement (.1); communications with T Moyron and M Shinderman regarding liquidating trustee (.1); review amended draft trust agreement and comments re same (.6)
07/15/20	C. Montgomery	3.50	2,800.00	B320	Continued revisions to liquidating trust agreement (3.2); phone call with T Moyron re Liquidating Trustee issues (.3)
07/15/20	J.A. Moe, II	0.10	59.93	B320	In regard to the Plan, review and respond to Henry Kevane's E-Mail on interpretation of the Plan.
07/15/20	J.A. Moe, II	0.20	119.85	B320	In regard to the Balloting, review Nick Koffroth's E-Mail, telephone call with Andres Estrada, and E-Mail from Malka Zeefe on resolution.
07/16/20	J.A. Moe, II	0.10	59.93	B320	Exchange E-Mails with Kathryn Howard on inquiry on Ballot, then exchange E-Mails with Tania Moyron on policy to respond to inquiries.
07/16/20	J.A. Moe, II	0.20	119.85	B320	In response to the inquiry on the package and Ballot, confer with Kathryn Howard and prepare proposed Response.
07/16/20	T. Moyron	0.20	119.85	B320	Letter from DTTC (.1); correspondence with KCC re same (.1).
07/16/20	R. Richards	0.80	578.40	B320	Work on revisions to Liquidating Trust Agreement.
07/16/20	N. Koffroth	0.70	351.05	B320	Participate in calls with T. Moyron re plan and claims issues x3 (0.3) (0.3) (0.1)
07/17/20	R. Richards	1.00	723.00	B320	Prepare and circulate revised Liquidating Trust Agreement.
07/17/20	K.M. Howard	0.30	75.23	B320	Reviewed email from Chris Wiley regarding voting procedures, plan and disclosure and prepared responsive email.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	T. Moyron	0.40	239.70	B320	Conference call with Mintz re plan, SGM and related matters.
07/19/20	J.A. Moe, II	0.20	119.85	B320	In regard to Ballots, review E-Mail from Tania Moyron and Dr. Carlo Cerruti on Ballot and E-Mail to Andres Estrada and to Dr. Cerruti on Class of Ballot.
07/20/20	J.A. Moe, II	0.90	539.33	B320	Review E-Mail from Paula Kirchner, on receipt, review and question on one of two Ballots, and E-Mail to Andres Estrada on question (.10); review Dr. Carlo Cerruti's response on Ballot, and E-Mail Reply on whether he filed a Claim, and E-Mail to Andres Estrada on why Carlo Cerruti was served (.20); review inquiry from Jerry Moore and E-Mail to Tania Moyron and Sam Alberts on issues raised by Mr. Moore, then consider and transmit E-Mail to Mr. Moore on Plan and Statement (.20); exchange E-Mails with Mr. Moore and E-Mail to Andres Estrada on transmitting the Plan, Disclosure Statement, the Notice Of Hearing and Order to Mr. Moore (.10); review voice mail, telephone call to Kathryn Howard on, and telephone call returned to Chris Wiley and E-Mail to Andrew Estrada on Ms. Wiley's \$25 Claim (.30).
07/20/20	K.M. Howard	0.30	75.23	B320	Reviewed followup email (.1) from Chris Wiley and telephone message to email regarding the voting ballots (.1); conferred with J. Moe regarding further responses (.1).
07/20/20	K.M. Howard	0.40	100.30	B320	Reviewed email from N. Koffroth regarding continued deadline to file plan supplement documents and reviewed and revised Critical Dates Memorandum.
07/20/20	K.M. Howard	0.10	25.08	B320	Prepared email to M. Barrios regarding the voting ballots.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	J.A. Moe, II	0.50	299.63	B320	In regard to Ballots, review Andres Estrada's response on the amount of Chris Wiley's Ballot (.10); in regard to inquiry, confirm with Andres Estrada the transmittal of Plan document to Jerry Moore (.10); confirmation from Andres Estrada on why Dr. Carlo Cerruti did not receive a Ballot and telephone call to Dr. Cerruti on rationale (.20); review E-Mail from Andres Estrada, and telephone call to Mr. Estrada on responding to Paula Kirchner on her two Ballots (.10).
07/22/20	S. Maizel	0.50	400.00	B320	Telephone conference with T. Moyron, etc. re plan voting issues.
07/22/20	S. Maizel	0.20	160.00	B320	Telephone conference with J. Garfinkle re Allscripts and plan confirmation issues.
07/22/20	S. Maizel	0.60	480.00	B320	Telephone conference with R. Adcock, BRG, etc. re plan confirmation issues.
07/22/20	S. Maizel	0.30	240.00	B320	Review and respond to emails re Swinerton issues vis-à-vis confirmation.
07/22/20	R. Richards	1.30	939.90	B320	Review plan provisions re insurance (0.7); update emails re same (0.2); review liquidating trust agreement comments (0.4).
07/22/20	T. Moyron	1.40	838.95	B320	Internal call regarding determination motions (.5); conference call with counsel for Allscript re plan (.1); conference call with counsel for CNA re plan (.1) analyze correspondence related to SEIU, etc. re same (.1); conference call with Mintz re plan matters (.3); correspond with Mintz re ballot (.1); exchange emails with KCC re ballot (.1); prepare email to Allscript counsel (.1).
07/22/20	C. Montgomery	0.20	160.00	B320	Communications with T Moyron regarding post effective date committee (.1); communications with T Moyron and M Garms regarding APA plan supplement (.1)
07/22/20	J.A. Moe, II	0.10	59.93	B320	In regard to inquiries on the Ballots, telephone call returned from and discussion with Ms. Wiley on the reason she received a Ballot and the reason for the designated amount on the Ballot.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	J.A. Moe, II	1.10	659.18	B320	In regard to Ballots on the Plan, exchange E-Mails with Sam Alberts on how amounts on the Ballots were calculated (.10); E-Mail to Andres Estrada on how individual's Ballots were ascribed the amounts for their Claims (.10); conference with Andres Estrada the SEIU Ballots (.10); review Andres Estrada's E-Mail and prepare E-Mail to Sam Alberts on action to determine basis for individual's Ballots (.20); review Andres Estrada's extensive response, forward to Sam Alberts, and exchange E-Mails with Mr. Alberts and Andres Estrada on individual claimant identification (.20); exchange additional E-Mails on Ballot for individual, that individual's amount, and how amount was scheduled (.20); commence research into amount of the scheduled claim working with Jon Emerson (.20).
07/22/20	J.A. Moe, II	0.70	419.48	B320	In regard to the Ballots, research answer to Tania Moyron's question on whether the Ballots have to be filed, reviewing what was done in two other cases, review of Local Rules, and conferring with bankruptcy colleague, then prepare E-Mail response that Ballots are not filed but must be available at the confirmation hearing (.60); E-Mail to Dan Bleck on requirements for Ballots in accordance with the Local Rules (.10).
07/22/20	J.A. Moe, II	0.40	239.70	B320	In regard to the Ballots on the Plan, review Tania Moyron's E-Mail on Jeff Garfinkle's inquiry, and confer with Andres Estrada on the aggregate amount of the Allscripts' Ballot and Allscripts filing one Ballot, then return E-Mail to Tania Moyron on assembling data (.20); await Ballot and E-Mail Ballot and answer to Mr. Garfinkle's inquiry (.20).
07/22/20	N. Koffroth	0.30	150.45	B320	Participate in internal call re voting issues

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	D. Pina	5.30	1,689.38	B320	Communications with R. Richards regarding requests for specific case materials and court filings (.2); analyze docket sheet and furnish copies of 2nd Amended Plan, Disclosure Statement and related filings (.5); further conduct comprehensive analysis of case docket sheet identifying filings related to hospital sales to Santa Clara County, the terminated sale to Strategic Global Management, Prime Healthcare, AHMC Healthcare and the Chan Soon-Shiong Family Foundation (2.9); obtain copies of sale motions, related orders, related asset purchase agreements and any additional related substantive filings (.8); assemble working files organized by assets and electronically distribute to R. Richards (.9).
07/23/20	C. Montgomery	0.30	240.00	B320	Communications with S Maizel regarding Swinerton objection to plan.
07/23/20	J.A. Moe, II	0.10	59.93	B320	In regard to the Ballots, review the Stipulation Estimating The Claims Of Integrity Healthcare, LLC, Solely For Voting Purposes.
07/24/20	C. Montgomery	2.30	1,840.00	B320	Communications with S Maizel regarding Swinerton objection to plan (.1); review materials re same and respond to S Maizel (1.7); phone call with T Moyron regarding confirmation planning (.5)
07/24/20	J.A. Moe, II	0.20	119.85	B320	In regard to Ballots, telephone call to Nam Nguyen on data breach on April 22, 2016, data breach of the of release of information, in response to the "fishing scam" involving impersonation.
07/24/20	J.A. Moe, II	0.50	299.63	B320	In regard to Ballots, review Andres Estrada's response on Data Breach Claimants receiving Ballots, and E-Mail to Mr. Estrada on Class 10 Ballots (.10); review List of Class 10 Ballots (.10); exchange E-Mails with Andres Estrada on revising Ballots (.10); exchange E-Mails with and confer with Nam Nguyen on 2016 Data Breach Claims (.20).
07/24/20	S. Maizel	0.40	320.00	B320	Multiple calls with T. Moyron re plan confirmation issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/24/20	K. Murphy	0.10	41.65	B320	Analyze email from Andres Estrada re confirmation of notice to various class action plaintiffs.
07/24/20	K.M. Howard	0.30	75.23	B320	Email exchange with N. Koffroth (.1); reviewed and revised Critical Date Memorandum regarding plan supplement documents (.2).
07/24/20	T. Moyron	1.60	958.80	B320	Conference call with D. Galfus re sale and plan status and other matters (.8); conference call with R. Adcock re same (.3); conference call with C. Montgomery re same (.5).
07/25/20	T. Moyron	1.00	599.25	B320	Analyze settlement agreement and comments thereto (.4); prepare correspondence related thereto (.1); correspond regarding liquidating trust agreement (.2); correspondence regarding voting summary with KCC (.2); review voting summary (.1).
07/25/20	C. Montgomery	0.80	640.00	B320	Participate in phone conference with S Maizel, T Moyron C Whitmore, M Preusker, J Reed regarding plan status and sales update (.7); communications with T Moyron and KCC regarding voting summary (.1)
07/25/20	M. Zeefe	0.20	96.05	B320	Correspondence with T. Moyron re plan settlement agreement.
07/25/20	S. Maizel	0.50	400.00	B320	Telephone conference with secured creditors re confirmation issues.
07/26/20	M. Zeefe	2.00	960.50	B320	Revise plan settlement agreement.
07/26/20	C. Montgomery	1.30	1,040.00	B320	Phone call with T Moyron regarding plan execution issues (.3); review and comment upon updated plan settlement agreement (1.0)
07/26/20	T. Moyron	0.10	59.93	B320	Correspond with P. Saba re status call.
07/26/20	J.A. Moe, II	0.10	59.93	B320	Review David Hartie's E-Mail reporting on the Ballots from Class 4 Claimants.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/20	T. Moyron	0.80	479.40	B320	Analyze changes to Liquidating Trust Agreement and updated version (.3); prepare email to co-plan proponents re same (.1); analyze redline of settlement agreement and updated settlement agreement (.4).
07/27/20	T. Moyron	0.20	119.85	B320	Call with P. Saba re ballots (.1); exchange emails with KKC re ballot summary (.1).
07/27/20	T. Moyron	0.20	119.85	B320	Analyze updated settlement agreement.
07/27/20	T. Moyron	0.20	119.85	B320	Analyze matters related to Chubb requests re Plan.
07/27/20	T. Moyron	0.60	359.55	B320	Call with P. Ricotta re Prime request re plan order (.1); conference call with M. Shinderman, P. Ricotta, J. Reisner, et al. re Prime request re same (.4); Follow up call with P. Ricotta re same (.1).
07/27/20	J.A. Moe, II	0.10	59.93	B320	In regard to Ballots and Documents, E-Mail to Dr. Carlo Cerruti on responding to inquiry on what Dr. Cerruti received.
07/27/20	J.A. Moe, II	0.20	119.85	B320	In regard to the Ballots, telephone calls from Johnny Rojas discussing with Mr. Rojas his receipt of documents and opportunity to vote on the Plan as a Class 9 Claimant.
07/27/20	T. Moyron	0.30	179.78	B320	Conference call with S. Maizel re SGM and plan.
07/27/20	T. Moyron	0.20	119.85	B320	Conference call with R. Adcock re AG motion and plan matters.
07/27/20	S. Maizel	1.00	800.00	B320	Telephone conference with C. Montgomery re Swinerton issues (.3); telephone conference with R. Amkraut re same (.3); review and respond to emails re same (.4).
07/27/20	M. Zeefe	1.90	912.48	B320	Emails re plan settlement agreement (0.1); calls with T. Moyron re same (0.1); call with C. Montgomery re same (0.2); revise and circulate same (1.1); begin drafting 9019 motion to approve same (0.4).
07/27/20	N. Koffroth	0.40	200.60	B320	Participate in call with M. Shinderman, J. Behrens, et al. re plan language
07/27/20	C. Montgomery	0.30	240.00	B320	Phone call with M Zeefe re plan settlement revisions.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	J.A. Moe, II	0.10	59.93	B320	In regard to Ballots, review form and content of Declarations tabulating the votes; review E-Mail on upcoming vote tabulation on July 26th.
07/28/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan confirmation issues.
07/28/20	S. Maizel	0.10	80.00	B320	Telephone conference with R. Amkraut re Swinerton issues.
07/28/20	K.M. Howard	0.10	25.08	B320	Email exchanges with KCC regarding corrections to service lists.
07/28/20	J.A. Moe, II	0.10	59.93	B320	In regard to Ballots received on the Plan, review Lydia Do's analysis of the Ballots received to date.
07/28/20	M. Zeefe	2.10	1,008.53	B320	Team emails re plan settlement agreement (0.2); circulate to plan co-proponents (0.3); draft 9019 motion to approve same (1.6).
07/28/20	R. Millner	0.90	720.00	B320	Extended telecon with G. Miller to analyze Chubb suggested plan revisions.
07/28/20	R. Millner	0.20	160.00	B320	Review draft from G. Miller re Chubb plan comments.
07/28/20	R. Millner	0.30	240.00	B320	Telecon G. Miller re finalizing memo as to Chubb plan comments.
07/28/20	G. Miller	3.90	1,723.80	B320	Calls with R. Millner re Chubb comments to Plan (1.5); review Chubb comments re plan and draft responses to same (2.4).
07/28/20	R. Richards	0.40	289.20	B320	Review prior pleadings on storage company (0.3), discuss same with Nick Koffroth (0.1).
07/28/20	T. Moyron	2.00	1,198.50	B320	Analyze SGM admin motion and related issues (.4); conference call re SGM admin motion (.8); conference call with C. Montgomery re same (.1); analyze Swinerton claims and related correspondence (.3); analyze additional matters related to admin claims (.4).
07/28/20	C. Montgomery	0.20	160.00	B320	Phone call with T Moyron regarding confirmation defense.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	G. Medina	6.60	1,935.45	B320	Communications with N. Koffroth regarding stipulations related to AppleCare and others (0.2); Draft Stipulations and orders Extending Time to Object to Confirmation Deadlines for AppleCare, Draft Long Beach Memorial Medical Center, Aetna and affiliates, MOB Lenders and field emails related to stipulations (4.5); revised all stipulations related to response dates and objections (1.1); Communication with T. Moyron regarding Stipulation with Integrity (0.1); further revised and send AppleCare Stipulation and Order to N. Koffroth (0.2); communication with Henry Kevane regarding Aetna stipulation and attorney contact information (0.1); review and file Final Notice of Executory Contracts and Unexpired Leases Designated By AHMC Healthcare Inc. For Assumption and Assignment Concerning Certain Assets Related To Seton Medical Center download and send to team (0.4).
07/29/20	J.A. Moe, II	0.50	299.63	B320	In regard to Ballots, telephone call from Norman Haslun on Jocelyn Filoteo submitting Ballot (.10); telephone call with Andres Estrada on Ms. Filoteo's right to vote (.10); return telephone calls to Mr. Haslun and discussion of status of Ms. Filoteo (.20; confer with Andres Estrada on scheduled claim (.10).
07/29/20	G. Medina	0.20	58.65	B320	Pull and send at the request of T. Moyron Joint Plan Filed.
07/29/20	M. Zeefe	2.20	1,056.55	B320	Continue drafting 9019 motion to approve plan settlement.
07/29/20	K.M. Howard	0.40	100.30	B320	Analysis of the stipulation continuing deadlines related to confirmation objection filed by Chubb Companies and reviewed and revised Critical Dates Memorandum.
07/29/20	R. Richards	0.20	144.60	B320	Review Jones Day comments on Liquidating Trust Agreement and Plan.
07/29/20	T. Moyron	0.50	299.63	B320	Analyze JD plan and LT comments (.3); correspond with JD re same (.1); prepare additional correspondence re same (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	T. Moyron	0.20	119.85	B320	Analyze emails from D. Eldan re Plan (.1); conference call with D. Eldan re same (.1).
07/29/20	T. Moyron	0.30	179.78	B320	Correspond with counsel for Allscripts (.1); correspond with KCC re ballot summary (.1); correspond with counsel for lenders re same (.1).
07/29/20	T. Moyron	0.30	179.78	B320	Analyze correspondence from various creditors and related stipulations to extend time and correspond re same.
07/30/20	T. Moyron	1.80	1,078.65	B320	Conference call with RPHE re proposed settlement (.3); analyze email from counsel to Toyon (.1); analyze Toyon objection (.3); analyze SGM objection (.5); analyze ballot summary (.1); forward ballot summaries (.1); analyze cases re objections (.4).
07/30/20	T. Moyron	0.50	299.63	B320	Conference call with H. Kevane, and S. Kahn re Aetna proposal.
07/30/20	T. Moyron	1.60	958.80	B320	Conference call with P. Saba re admin claim objections (.3); analyze KCC updated ballot summary (.1); analyze cases re admin objections (.7); analyze plan in connection with recoupment/setoff (.3); analyze correspondence from parties re extensions (.2).
07/30/20	T. Moyron	0.30	179.78	B320	Exchange emails with counsel for Premier re extension (.1); analyze issues related to settlement (.1); analyze limited objection (.1).
07/30/20	R. Millner	0.10	80.00	B320	Emails to J. Moe et al re insured claim plan provision and waivers of deficiency.
07/30/20	R. Richards	1.10	795.30	B320	Review 2019 GRM agreements (0.4); review KCC claims log re GRM claims (0.2); call with GRM counsel and Koffroth (0.4); further call with Koffroth re GRM claims (0.1).
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation to continue the confirmation objection deadline for Integrity Healthcare and reviewed and revised Critical Dates Memorandum.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation continuing confirmation deadlines for Long Beach Memorial Hospital and reviewed and revised Critical Dates Memorandum.
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation continuing confirmation objection deadlines for Aetna Insurance and reviewed and revised Critical Dates Memorandum.
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation to continue the confirmation objection deadline for AppleCare and reviewed and revised Critical Dates Memorandum.
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation continuing confirmation objection deadlines for Premier, Inc. and reviewed and revised Critical Dates Memorandum.
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation continuing confirmation objection deadline for Scan Health and reviewed and revised Critical Dates Memorandum.
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation continuing confirmation objection deadlines for Swinerton Builders and reviewed and revised Critical Dates Memorandum.
07/30/20	K.M. Howard	0.20	50.15	B320	Reviewed and assembled SGM's confirmation objection (.1); prepared email to Verity Team (.1).
07/30/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation continuing confirmation objection deadlines for United Healthcare and reviewed and revised Critical Dates Memorandum.
07/30/20	S. Maizel	0.30	240.00	B320	Telephone conference with R. Amkraut re Swinerton issues (.1); review and respond to emails re continuance and stipulation for Swinerton (.2).
07/30/20	C. Montgomery	1.40	1,120.00	B320	Communications with N Koffroth an plan proponents regarding deadline for trustee identification (.1); review SGM objection to confirmation (.6); review Premier rejection objection in light of request for more time on confirmation objection issues (.5); communications with T Moyron re same (.2)



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	G. Medina	0.80	234.60	B320	Review docket and create list of plan objections (0.4); pull all plan objections and send to S. Maizel, T. Moyron and N. Koffroth (0.4).
07/30/20	J.A. Moe, II	0.10	59.93	B320	Telephone call returned by Dr. Carlo Cerruti, answering Dr. Cerruti's questions on documents he received in regard to the Plan.
07/30/20	J.A. Moe, II	0.10	59.93	B320	Review E-Mail from Andres Estrada and the "final" report on balloting on the Plan of Liquidation.
07/30/20	J.A. Moe, II	0.30	179.78	B320	In regard to Plan Documents, respond to Karen Chapman's inquiry on Plaintiff's Attorney's question, describing Plan Documents and using Ballot to vote on the Plan.
07/30/20	J.A. Moe, II	0.10	59.93	B320	Review updated Voting Summary on balloting on the proposed Plan, received from Andres Estrada.
07/30/20	J.A. Moe, II	0.40	239.70	B320	Prepare E-Mail Memorandum on change to description of the treatment of Class 9 Claims, and question on how insured claimants are treated who obtained relief from stay seeking recovery from insurance only.
07/30/20	J.A. Moe, II	0.50	299.63	B320	/SCAN Health/ Telephone call returned to Dan Besikoff on Objection to the Plan, and opportunity to review and discuss Objection (.10); E-Mail to Tania Moyron and Nick Koffroth on extension to deal with Objection (.10); exchange E-Mails with Nick Koffroth and telephone call to Mr. Besikoff on extension (.10); exchange E-Mails with Tania Moyron and then George Medina, on Ms. Moyron's direction on preparation of Stipulation, and Mr. Medina's exchange of E-Mails with Mr. Besikoff on Stipulation (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	G. Medina	3.60	1,055.70	B320	Work on drafting new stipulations and orders extending time for SCAN Health, Swinerton Builders, and Premier, Inc. (1.4); call with N. Koffroth regarding Aetna stipulation and revised per the request of counsel (0.5); respond to team emails related to Stipulations (0.4); work on filing and uploading stipulations extending time to respond to confirmation deadlines (1.2); communication with counsel to Premier, Inc. regarding Stipulation (0.1).
07/31/20	S. Martin	0.40	304.30	B320	Review SGM's objection to plan confirmation.
07/31/20	S. Maizel	0.60	480.00	B320	Telephone conference with T. Moyron, etc. re plan confirmation issues.
07/31/20	S. Maizel	0.50	400.00	B320	Telephone conference with M. Shinderman, etc. re confirmation issues.
07/31/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re confirmation issues.
07/31/20	L. Whidden	8.70	6,659.85	B320	Conference call with C Montgomery re: SGM Confirmation Objection and Affidavit of CFO in support of confirmation and calculations re: administrative claims (.4); conference call with Tania Moyron and team members re: SGM confirmation objection; cases re: pending litigation and feasibility and responses to objections to confirmation (.4); review objections to cases cited in SGM Objection and follow up call and review of additional case law and factual information in support of feasibility and for input in Declaration in support of confirmation (2.9); review plan and disclosure statement and calculations provided by BRG of filed claims for input in CFO Declaration (1.6); follow up call with C Montgomery re: factual issues relating to objections to claims (.3); conference call re: claims exhibit in support of confirmation (.5); begin draft of CFO declaration in support of confirmation (. 9); review additional background information and case law re: feasibility issues and 1129 9a)(9) (1.5); review emails from T Moyron re: same (.2)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	J.A. Moe, II	0.50	299.63	B320	Attend conference call with Tania Moyron, Sam Maizel, Malka Zeefe, Claude Montgomery, Lee Whidden and Nick Koffroth on the Plan and Confirmation, commencing work in preparation for a Response to the Objections to the Plan and the hearing on August 12th.
07/31/20	J.A. Moe, II	0.50	299.63	B320	Telephone call with Karleen Murphy on preparation for the conference call on what happens to Litigation post confirmation (.10); telephone conference with Hope Levy-Biehl, Karen Chapman, Elspeth Paul, Karleen Murphy and Tania Moyron on administration of litigation post confirmation (.40).
07/31/20	C. Montgomery	2.10	1,680.00	B320	Phone calls with T Moyron regarding confirmation defense (.3); phone call with T Moyron regarding feasibility evidence issues (.9); participate in phone conference with T Moyron, S Maizel, MZeefe N Koffroth and L Whidden regarding responses to confirmation objections (.5); phone call with L Whidden regarding feasibility evidentiary presentation (.4)
07/31/20	K. Murphy	0.10	41.65	B320	Telephone call with John Moe in advance of team call re post confirmation case handling of state court matters.
07/31/20	T. Moyron	3.70	2,217.23	B320	Conference call with M. Shinderman re plan (.3); conference call with D. Bleck and S. Maizel re plan (.5); analyze matters related to confirmation brief, cases and objections (2.3); conference call with Milbank, Mintz and Pachulski re payors and risk counter parties and plan (.1); conference call internal re confirmation brief and declaration (.5).
07/31/20	N. Koffroth	3.80	1,905.70	B320	Draft confirmation brief in support of Second Amended Plan
07/31/20	M. Zeefe	4.40	2,113.10	B320	Call with team re confirmation documents (0.5); circulate plan settlement 9019 motion (0.1); emails re SGM objection (0.2); create chart of SGM brief cases and research same (2.8); call with T. Moyron re same (0.8).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	T. Moyron	0.70	419.48	B320	Conference call with N. Koffroth re administrative claims (.3); analyze administrative claims chart (.2); correspond with BRG re same (.2).
07/31/20	T. Moyron	0.20	119.85	B320	Analyze emails re stipulations (.1); analyze orders re stipulations (.1).
07/31/20	T. Moyron	0.40	239.70	B320	Analyze standards and research re feasibility.
07/31/20	N. Koffroth	0.60	300.90	B320	Participate in internal call re confirmation brief
07/31/20	R. Richards	0.60	433.80	B320	Call re plan confirmation preparation.
	<b>Subtotal</b>	<b>198.60</b>	<b>118,052.95</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**B400 - Bankruptcy-Related Advice**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	E. Cobarrubias	0.30	80.33	B400	Locate citation and copy of 6th Circuit opinion interpreting Section 959(b) in Kentucky Emp. Ret. System v. Seven Counties Svcs., for S. Maizel.
	<b>Subtotal</b>	<b>0.30</b>	<b>80.33</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

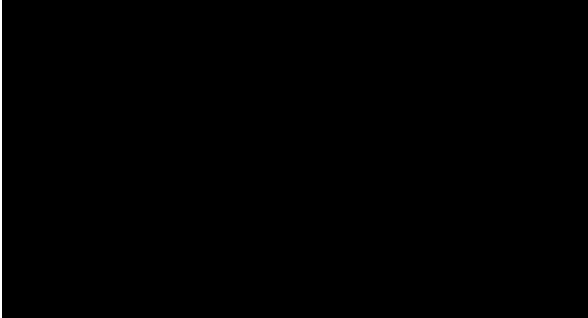
August 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	T. Moyron	0.90	539.33	EMP	Analyze correspondence from A. Ruda, et al., re SEIU (.4); analyze correspondence related to UNAC (.3); analyze correspondence from F. Sze, et al. re administrative appeal (.2).
07/01/20	M. Zeefe	7.50	3,601.88	EMP	Draft P. Chadwick declaration in support of 1113 reply (3.4); revise SEIU stipulation re 1113 proposal (3.5); calls with T. Moyron re 1113 docs (0.6).
07/01/20	S. Maizel	0.40	320.00	EMP	Telephone conference with T. Moyron re labor filings.
07/01/20	G. Medina	11.10	3,255.08	EMP	Work on organizing, replacing and redacting exhibits to reply (6.1); Numerous calls and communication with Dentons team, Verity, BRG, BZBM and R. Adcock related to identifying and redacting additional confidential information (3.0); prepared and assembled all exhibits and send to T. Moyron for final review(1.1); work on filing reply (0.5); download filed copy and send to team (0.4).
07/03/20	S. Maizel	0.60	480.00	EMP	Telephone conference with UNAC and counsel re discovery and 1113 motion.
07/03/20	T. Moyron	0.50	299.63	EMP	Analyze L. Fernandez correspondence and attachments re benefit matters (.2); analyze A. Ruda et al., correspondence re Local 20 (.2); analyze AHMC re United (.1).
07/07/20	T. Moyron	0.90	539.33	EMP	Conference call with A. Ruda, J. Moe, et al. (.2); labor call with R. Adcock, BRG, S. Alberts, et al. (.3); correspond regarding same (.1); conference call with R. Adcock thereafter re same and related labor matters (.3).
07/07/20	N. Koffroth	0.40	200.60	EMP	Participate in weekly call with R. Adcock, P. Chadwick, et al. re labor issues
07/07/20	A. Shiran	0.40	205.80	EMP	Labor call.
07/07/20	S. McCandless	0.40	319.60	EMP	Team labor/bankruptcy call.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	D. Cook	0.40	188.70	EMP	Telephone conference with S Alberts regarding research question pertaining to CNA CBA (.1); research regarding same (.3);
07/07/20	S. Maizel	0.40	320.00	EMP	Telephone conference with BRG, R. Adcock, etc. re 1113 issues.
07/08/20	T. Moyron	0.20	119.85	EMP	Analyze final version of PBGC 9019 motion.
07/08/20	D. Cook	4.90	2,311.62	EMP	Research pertaining to treatment of CNA CBA.
07/09/20	S. McCandless	1.10	878.90	EMP	
07/09/20	A. Shiran	0.50	257.25	EMP	
07/10/20	A. Shiran	1.90	977.55	EMP	
07/10/20	P. Flucke	0.90	451.35	EMP	Review answer to NLRB complaint and revise same (.7); discuss answer and responses thereto with S. McCandless (1.0); correspondence with T. Moyron regarding answer to NLRB complaint (.2).
07/11/20	P. Flucke	8.40	4,212.60	EMP	Work on section 1113 rejection motion regarding collective bargaining agreements.
07/12/20	P. Flucke	6.40	3,209.60	EMP	Work on section 1113 rejection motion regarding collective bargaining agreements.
07/12/20	G. Medina	2.70	791.78	EMP	Call and numerous communications with C. Doherty and work on assembly, organization and redactions of 1113 Exhibits.
07/13/20	G. Medina	1.40	410.55	EMP	Continue to assist in compiling and revising exhibits to the 1113 motion.
07/13/20	T. Moyron	0.20	119.85	EMP	Analyze H. Levy-Biehl, et al., emails re SFMC employee authorization.
07/13/20	P. Flucke	0.10	50.15	EMP	Work on section 1113 rejection motion regarding collective bargaining agreements.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

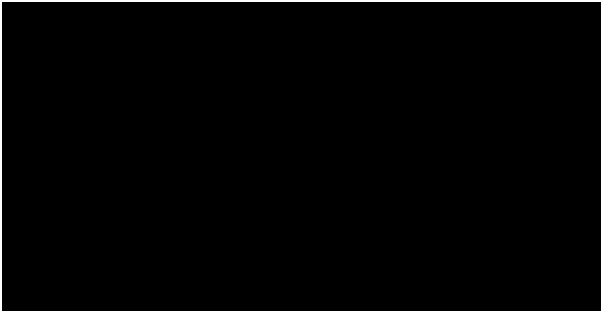
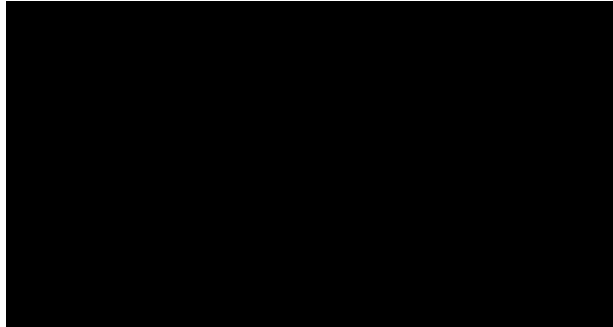
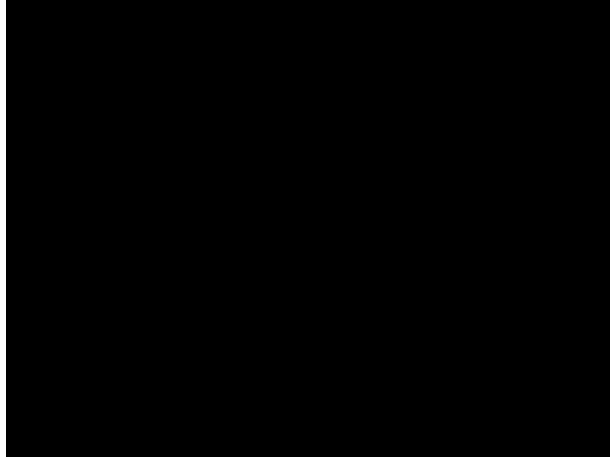
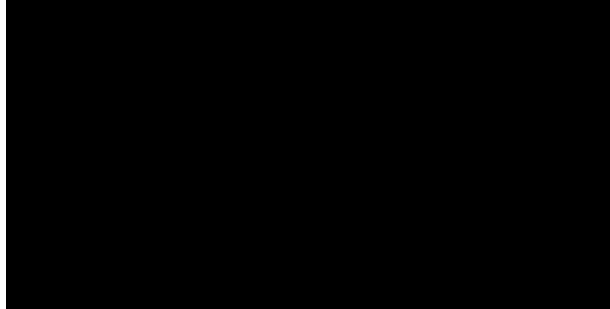
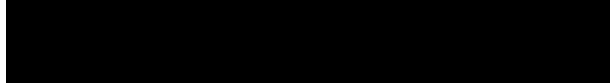
August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/20	T. Moyron	0.80	479.40	EMP	Analyze and prepare comments to motion to reject RPHE agreement (.6); correspond regarding same (.2).
07/14/20	A. Shiran	0.80	411.60	EMP	Labor call.
07/14/20	G. Medina	2.00	586.50	EMP	Work on additional exhibits related to 1113 motions and communications and call with C. Doherty regarding status and filing.
07/14/20	N. Koffroth	0.80	401.20	EMP	Participate in weekly labor call with A. Ruda, R. Adcock, et al.
07/14/20	T. Moyron	0.60	359.55	EMP	Conference call with R. Adcock, BRG, BZBM, etc. re labor matters.
07/14/20	S. Alberts	0.70	560.00	EMP	Weekly labor call.
07/14/20	S. McCandless	0.80	639.20	EMP	Team labor call.
07/15/20	G. Medina	0.70	205.28	EMP	Received, review rejection motion and prepare exhibit to motion at the request of M. Zeefe.
07/15/20	G. Medina	0.80	234.60	EMP	Communication with N. Koffroth regarding 1113 filing and exhibits (0.1); review and combine exhibits and send to N. Koffroth and N. Doherty (0.7).
07/16/20	D. Cook	6.30	2,972.09	EMP	Revise motion to reject Local 39 agreements (.6); communications with client regarding same (.2); communications with Dentons team regarding same (.6); telephone conference with T Moyron regarding same (.1); revise notice shortening materials (1.8); analysis pertaining to same (.6); draft order shortening time (.3); prepare materials to be filed (2.1);
07/16/20	G. Medina	4.00	1,173.00	EMP	Communication with T. Moyron and team regarding filings (0.4); Assist with preparation, review and filing of Motion pursuant to §1113 To Reject and Terminate Remaining Collective Bargaining Agreements, Motion to Reject Lease or Executory Contract Pursuant To 11 U.S.C. § 365(A), Trust Agreement For The Retirement Plan For Hospital Employees, Application shortening time, lodge Order and Local 39 Union Rejection Motion (3.4); call with T. Moyron regarding RPHE Motion



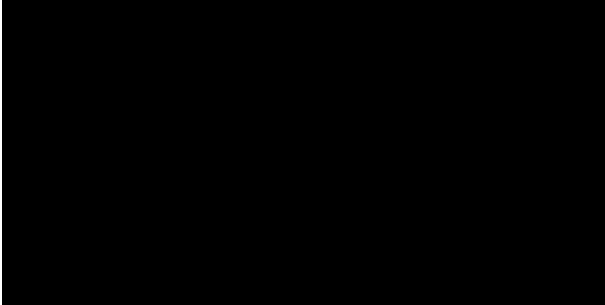
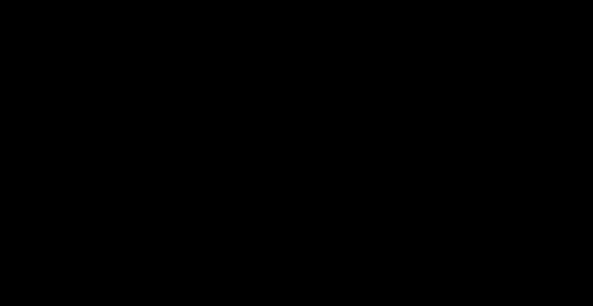
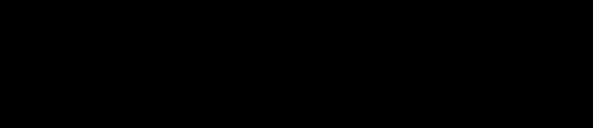
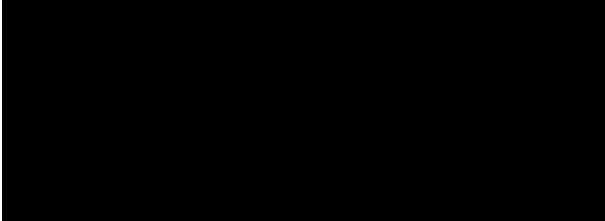
Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative (0.2).
07/16/20	S. McCandless	1.20	958.80	EMP	
07/17/20	M. Zeefe	0.50	240.13	EMP	Final review of Local 39 rejection motion and shortened notice papers.
07/17/20	D. Cook	3.80	1,792.69	EMP	Revisions regarding Local 39 rejection materials in accordance with amended notice pertaining to same (2.5); preparation of same for filing (.4); analysis pertaining to same (.3); communications with Dentons team regarding same (.3); analysis of communications pertaining to same (.3);
07/17/20	S. McCandless	1.40	1,118.60	EMP	
07/17/20	S. Maizel	1.10	880.00	EMP	Telephone conference with R. Adcock, BRG, etc. re 1113 motions.
07/17/20	T. Moyron	0.50	299.63	EMP	
07/20/20	A. Shiran	1.50	771.75	EMP	
07/20/20	E. Bass	0.40	219.30	EMP	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	S. McCandless	1.20	958.80	EMP	
07/20/20	A. Ruegger	6.10	4,880.00	EMP	Continued drafting of Determination Motion re union claims (5.0); teleconference with T. Moyron, C. Montgomery, S. Alberts and N. Koffroth re Determination Motion (0.6); communications with E. Bass re PTO portion of Determination Motion (0.3); communications with C. Montgomery re unions claims (0.2).
07/21/20	S. McCandless	1.10	878.90	EMP	
07/22/20	A. Shiran	2.20	1,131.90	EMP	
07/22/20	E. Bass	0.40	219.30	EMP	Draft insert for filing re Unions have no standing to pursue PTO claims.
07/22/20	S. McCandless	1.60	1,278.40	EMP	
07/22/20	A. Ruegger	2.20	1,760.00	EMP	Revise draft Determination Motion reunions claims (1.3); communications with T. Moyron and Dentons team re same (0.4); conference call with T. Moyron and Dentons team re union pension claims and settlements re same (0.5).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	T. Moyron	2.80	1,677.90	EMP	Conference call with R. Adcock, A. Ruda, et al. re labor matters (.8); analyze and finalize CNA term sheet (1.3); analyze related correspondence (.3); analyze A. Ruda, et al., correspondence re other labor matters (.4).
07/23/20	S. McCandless	0.50	399.50	EMP	
07/24/20	S. McCandless	2.70	2,157.30	EMP	
07/24/20	A. Shiran	1.20	617.40	EMP	
07/24/20	T. Moyron	0.20	119.85	EMP	Conference call with A. Ruda re upcoming labor matters (.1); conference call with C. Doherty re same (.1).
07/25/20	S. McCandless	0.10	79.90	EMP	
07/27/20	T. Moyron	0.20	119.85	EMP	
07/27/20	G. Medina	0.80	234.60	EMP	Review, prepare and assemble Status report of Consensual Resolutions and Supplement To Omnibus Motion Under Bankruptcy Code § 1113 (0.4); work on filing, download and send e filed copy to team (0.4).
07/27/20	S. Maizel	0.30	240.00	EMP	Review and revise correspondence re RPHE claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	A. Shiran	3.70	1,903.65	EMP	Correspondence regarding post offer/pre employment communication/healthcare authorization to employees; review and analyze same (.9); discuss same with S. McCandless (.8); review correspondence regarding employment record authorization sent to employees and correspondence relating to same (.4); discuss same internally and with S. McCandless (.9); draft proposed revisions to same (.4); discuss authorizations relating to release healthcare records with S. McCandless and S Groden (.3).
07/27/20	D. Cook	0.30	141.53	EMP	Email communications regarding Local 39 rejection.
07/28/20	J.A. Moe, II	0.20	119.85	EMP	/Paid Time Off/ Confer with Elina Tilman on how to deal with prepetition and post-petition PTO, and effect on payment of employee leaving now.
07/28/20	A. Shiran	0.40	205.80	EMP	Attend labor call.
07/28/20	S. Maizel	0.20	160.00	EMP	Telephone conference with T. Moyron re labor issues.
07/28/20	S. Maizel	0.50	400.00	EMP	Telephone conference with R. Adcock, etc. re labor issues.
07/28/20	D. Cook	0.60	283.06	EMP	Telephone conference regarding SEIU update.
07/28/20	N. Koffroth	0.50	250.75	EMP	Participate in internal call re issues related to 1113 motion
07/28/20	N. Koffroth	0.50	250.75	EMP	Participate in weekly internal call re employee matters with R. Adcock, P. Chadwick, et al.
07/28/20	S. McCandless	0.50	399.50	EMP	Attend team labor conference call.
07/29/20	T. Moyron	0.50	299.63	EMP	Participate in Telephonic Hearing re 1113 motion, PBGC motion, etc.
07/29/20	S. McCandless	1.10	878.90	EMP	

consideration filed in Bankruptcy Court as related to closing dates of sales (.30).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	A. Shiran	2.90	1,492.05	EMP	

<b>Subtotal</b>		<b>116.80</b>	<b>61,903.39</b>		
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/03/20	T. Moyron	0.20	119.85	INS	Analyze matter related to Old Republic.
07/03/20	T. Moyron	0.10	59.93	INS	Analyze email from P. Anderson and reply to same re Old Republic.
07/03/20	G. Miller	0.40	176.80	INS	Pull relevant letters of credit, policies, and stipulations re Old Republic adversary and send to R.Millner
07/03/20	J.A. Moe, II	0.20	119.85	INS	In regard to the Plan, review E-Mails on insurance related Plan issues and Old Republic, and E-Mail to Rob Milner on insurance.
07/04/20	J.A. Moe, II	0.20	119.85	INS	In regard to the Plan and insurance related issues, review E-Mails from Robert Milner on Old Republic, and Mr. Milner's proposed responses to Old Republic's inquiries.
07/04/20	R. Millner	0.50	400.00	INS	Review existing stipulations and orders relating to Old Republic Insurance and workers comp issues.
07/04/20	R. Millner	0.50	400.00	INS	Review pleadings and court approval of accommodations granted to Old Republic in connection with workers comp policy renewal.
07/04/20	R. Millner	0.40	320.00	INS	Review plan provisions relating to insurance, insured claims, insurance policies, administrative claims and liquidating trust.
07/04/20	R. Millner	0.40	320.00	INS	Review additional pleadings relating to adversary proceeding as to Old Republic and other matters.
07/04/20	R. Millner	0.50	400.00	INS	Draft email to S. Maizel and T. Moyron re questions raised by counsel for Old Republic re plan and related issues.
07/06/20	T. Moyron	0.50	299.63	INS	Conference call with P. Anderson, R. Millner, et al. re Old Republic.
07/06/20	R. Millner	0.50	400.00	INS	Telecon with P. Anderson, J. Moe, T. Moyron and G. Miller re Old Republic issues as to various plan provisions concerning insurance.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	C. Montgomery	5.60	4,480.00	INS	Continue drafting memo re insurance continuation issues and review of bylaws.
07/06/20	G. Miller	0.30	132.60	INS	Call with R. Millner to discuss Marrilac and Old Republic letter of credit.
07/06/20	G. Miller	0.50	221.00	INS	Call with P. Anderson, T. Moyron and R. Millner re Marrilac and Old Republic letter of credit.
07/06/20	J.A. Moe, II	0.50	299.63	INS	Conference telephone call with Tania Moyron, Robert Milner, Geoffrey Miller and Peg Anderson on issues revolving around Old Republic and Marillac Insurance.
07/07/20	R. Millner	0.40	320.00	INS	Email to T. Moyron et al re Old Republic points for treatment.
07/07/20	C. Montgomery	0.50	400.00	INS	Complete D&O insurance note and communications with T Moyron re same.
07/07/20	C. Montgomery	0.10	80.00	INS	Communications with R Millner regarding Plan and insurance settlements.
07/08/20	R. Millner	0.60	480.00	INS	Emails to T. Moyron for transmission to committee re explanation as to Old Republic (workers comp) insurance issues regarding plan.
07/09/20	R. Millner	0.40	320.00	INS	Emails to C. Montgomery re policy provisions and issues as to Old Republic claim adjusting provisions.
07/09/20	R. Millner	0.20	160.00	INS	Emails to T. Moyron re Old Republic claims.
07/09/20	R. Millner	0.10	80.00	INS	Emails to J. Moe re Old Republic proof of claim.
07/09/20	G. Miller	0.30	132.60	INS	Call with C. Montgomery re Marrilac payment of deductibles to Old Republic.
07/09/20	C. Montgomery	0.20	160.00	INS	Communications with R Richards and G Miller regarding workmens compensation insurance.
07/13/20	R. Millner	0.60	480.00	INS	Draft stipulation re Old Republic waiver as to administrative bar date.
07/14/20	C. Montgomery	0.70	560.00	INS	Communications with R Millner, T Moyron and T Conner regarding ORIC insurance collateral (.1); participate in conference call with Lockton and R Millner re workers compensation reserve (.6)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/20	R. Millner	0.10	80.00	INS	Read email from T. Moyron re workers comp reserves and possible excess funding.
07/14/20	R. Millner	0.10	80.00	INS	Discussion with Lockton, R. Adock, T. Moyron and C. Montgomery re funding and excess workers comp security.
07/14/20	J.A. Moe, II	0.30	179.78	INS	/Old Republic/ Prepare draft of the Stipulation on waiver of requirement for Old Republic to file an Administrative Claim.
07/16/20	R. Millner	0.30	240.00	INS	Analyze email from L. Wall re workers comp reserve analysis.
07/16/20	J.A. Moe, II	0.30	179.78	INS	/Old Republic/ Revise the proposed Stipulation by and between Verity and Old Republic on waiver of obligation to file an Administrative Expense Claim.
07/17/20	C. Montgomery	1.90	1,520.00	INS	Communications with T Moyron and R Millner regarding changes to plan and release of reserves from Old REpublic (.2); communications with T Moyron regarding insurance duration memo and update same (1.4); communications with T Moyron regarding insurance stipulation (.3)
07/17/20	O. Pinkas	0.40	320.00	INS	Calls with T. Moyron and R. Richards on Marillac sale process.
07/17/20	R. Millner	0.20	160.00	INS	Emails to T. Moyron re issues pertaining to Verity insurance matters.
07/17/20	J.A. Moe, II	0.20	119.85	INS	/Old Republic/ Prepare Order on Stipulation for Old Republic, on waiver of obligation to file an Administrative Claim.
07/17/20	T. Moyron	1.40	838.95	INS	Analyze Old Republic issues related to administrative claim, plan and collateral release (.6); prepare correspondence regarding same to Mintz and Milbank (.3); analyze correspondence from Mintz and reply to same (.1); internal correspondence regarding same (.2); call with C. Montgomery re same (.2).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	T. Moyron	0.90	539.33	INS	Conference call with R. Richards re outstanding ins. matters (.2); correspond with C. Montgomery re board existence (.1); review analysis (.2); analyze outstanding insurance matters (.2); prepare emails to Lockton, et al. (.2).
07/18/20	T. Moyron	3.50	2,097.38	INS	Conference call with Lockton, BRG, R. Millner, et al. re Marillac, OR, and related (1.2); conference call with BRG, T. Conner, R. Millner, et al. re Marillac and other insurance matters (1.6); conference call with D. Galfus re same (.3); analyze open insurance matters (.4).
07/18/20	R. Millner	1.10	880.00	INS	Telecon L. Well (Lockton), T. Moyron, S. Maizel, et al re insurance issues including Marillac and plan issues.
07/18/20	R. Millner	1.50	1,200.00	INS	Telecon T. Moyron, C. Montgomery and client re pending insurance matters including Marillac.
07/18/20	R. Richards	2.90	2,096.70	INS	Call with Lockton and team re Marillac and insurance issues (1.1); review open insurance emails (0.2); call re BRG and team re insurance issues (1.6)
07/18/20	C. Montgomery	1.80	1,440.00	INS	Participate in phone conference with T. Moyron, R. Millner, D. Galfus, S. Maizel, N. Koffroth regarding Old Republic insurance and plan related issues (1.6); follow up call with T. Moyron (.2).
07/18/20	S. Maizel	2.80	2,240.00	INS	Telephone conference with Lockton, R. Adcock, etc. re Marrillac issues (1.2); telephone conference with BRG, R. Adcock, etc. re same (1.6).
07/19/20	R. Richards	0.50	361.50	INS	Emails re drafts of Marillac presentation and comments on same, follow up with Lockton re same.
07/19/20	R. Millner	0.30	240.00	INS	Emails to T. Moyron re comments on Galfus email.
07/19/20	R. Millner	0.20	160.00	INS	Read emails re Galfus emails re insurance issues.
07/19/20	R. Millner	0.20	160.00	INS	Read emails from T. Moyron re Galfus insurance issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/19/20	J.A. Moe, II	0.10	59.93	INS	In regard to administrative claims, review exchange of E-Mails with Tania Moyron and Margaret Anderson on issues to be resolved with Old Republic.
07/19/20	C. Montgomery	0.60	480.00	INS	Phone call from D Galfus regarding plan effective implications of insurance questions (.5); communications with D Galfus and T Moyron re same (.1)
07/19/20	T. Moyron	0.70	419.48	INS	Analyze BRG draft Marillac slides (.3); prepare comments to same and correspondence (.4).
07/20/20	R. Millner	0.30	240.00	INS	Telecon T. Moyron, Lockton, Aldock re status of insurance issues.
07/20/20	C. Montgomery	0.40	320.00	INS	Communications with D Galfus, T Moyron, S Maizel and P Andersen regarding Old Republic issues (.3); communications with R. Richards and D. Galfus re Marillac issues (.1)
07/20/20	R. Richards	0.40	289.20	INS	Emails re D&O insurance (0.1); group call re same (0.3).
07/20/20	R. Richards	0.20	144.60	INS	Follow up on Marillac due diligence items and email BRG re same.
07/21/20	R. Richards	1.50	1,084.50	INS	Review comments on Marillac slides (0.3); two rounds of revisions to Marillac slides (0.4); call with creditors re Old Republic (0.4); emails re going forward insurance coverage (0.1); call with David Galfus re going forward insurance (0.2); review final form of order for Vazquez lift stay stipulation (0.1).
07/21/20	R. Millner	0.40	320.00	INS	Review coverage charts and information re coverage.
07/21/20	R. Millner	0.50	400.00	INS	Telecon Mintz Leven, D. Golfas, T. Moyron et al re Old Republic related matters.
07/21/20	R. Millner	0.10	80.00	INS	Review slides prepared by R. Richards.
07/21/20	T. Moyron	1.20	719.10	INS	Conference call with Mintz, Milbank, Dentons re Old Republic (.5); analyze and prepare comments to slides (.3); analyze updated slides (.1); analyze T. Conner, et al., emails re insurance (.3).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	S. Maizel	0.50	400.00	INS	Telephone conference with Mintz, etc. re Marillac issues.
07/21/20	C. Montgomery	1.20	960.00	INS	Communications with R Richards and T Moyron regarding Marillac (.2); review accumulated mail regarding Marillac (.3); participate in conference call with M Shinderman and P Ricotta, T Moyron, R Millner regarding OLd Republic (.5); follow up communications with T Moyron (.1); communications with T Conner regarding Chubb premium (.1)
07/21/20	J. Fisher	0.50	189.00	INS	Correspondence regarding Marillac sale process; review documents in connection with same.
07/22/20	C. Montgomery	0.60	480.00	INS	Participate in conference call with M. Shinderman, P. Ricotta, L. Wall, R. Millner, T. Moyron, S. Maizel, D. Galfus re Marillac issues (.5); communications with R. Richards and R. Millner regarding plan supplement and insurance issues (.1).
07/22/20	R. Millner	0.50	400.00	INS	Telecon Mintz Leven, T. Moyron, Lockton re issues relating to Marillac sale.
07/22/20	R. Millner	0.70	560.00	INS	Telecon M. Egan, T. Moyron, Lockton, Ty Connor re Chubb coverage issues.
07/22/20	R. Millner	0.10	80.00	INS	Email to R. Richards re revised slides as to insurance issues.
07/22/20	R. Millner	0.30	240.00	INS	Review insurance provisions of plan.
07/22/20	R. Millner	0.40	320.00	INS	Brief review of APA provisions re insurance.
07/22/20	R. Millner	0.20	160.00	INS	Telecon S. Maizel, T. Moyron, P. Anderson re Old Republic issues with regard to plan and administrative claim.
07/22/20	S. Maizel	0.50	400.00	INS	Telephone conference with Mintz, etc. re Marillac sales issues (.3); telephone conference with Peg Anderson, etc. re same (.2).
07/22/20	R. Richards	0.80	578.40	INS	Review Marillac slides (0.2); call with creditors re Marillac (0.6).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	T. Moyron	1.70	1,018.73	INS	Conference call with P. Anderson re administrative stipulation (.1); conference call with Mintz, Lockton, Milbank, BRG and Dentons re Marillac sale (.5); conference call with Lockton, BRG, Verity, et al. re insurance matters (.4); analyze insurance matters and correspondence (.3); analyze OR stipulation (.2); correspond regarding Marillac slides and analyze same (.2).
07/22/20	N. Koffroth	0.50	250.75	INS	Participate in call with counsel to Committee and Lockton re Marillac
07/22/20	N. Koffroth	0.20	100.30	INS	Participate in call with counsel to Old Republic Insurance Company re plan issues
07/22/20	J.A. Moe, II	0.50	299.63	INS	In regard to Old Republic, revise the Stipulation and Order (on the Stipulation) and transmit for revision (.30); further revisions to page 2 and transmit for further revision (.20).
07/23/20	R. Millner	0.30	240.00	INS	Revise stipulation and draft order regarding Old Republic Admin claim.
07/23/20	J.A. Moe, II	0.20	119.85	INS	/Old Republic/ Review Robert Millner's changes to the proposed Stipulation and Order in regard to Old Republic and Administrative Claims.
07/24/20	J.A. Moe, II	0.70	419.48	INS	/Old Republic/ Review Robert Millner's proposed additions to his Stipulation and Order, then make minor revisions (.40); review and note three additional revisions to the Stipulation and Order, effectuate revisions, and transmit to Robert Millner (.30).
07/24/20	T. Moyron	0.20	119.85	INS	Analyze Old Republic stipulation and order (.1); prepare email regarding same (.1).
07/26/20	T. Moyron	0.30	179.78	INS	Analyze J. Behrens, et al., correspondence regarding Old Republic stipulation and order (2); prepare email re same (.1).
07/26/20	R. Millner	0.20	160.00	INS	Review creditors email re draft stipulation re Old Republic administrative claim.
07/26/20	R. Millner	0.60	480.00	INS	Emails T. Moyron et al re stipulation and provision re return of collateral re Old Republic.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/20	R. Millner	0.30	240.00	INS	Emails P. Ricotta re letter of credit related matters.
07/26/20	J.A. Moe, II	0.50	299.63	INS	/Old Republic/ Review multiple E-Mails on the Committee's proposed revisions to the Stipulation and Order, and Robert Millner's responses and proposals, printing E-Mails and reviewing revised Stipulation and Order.
07/27/20	J.A. Moe, II	2.50	1,498.13	INS	/Old Republic/ Continue to review additional exchanges of E-Mails on revisions to the Stipulation and Order with Old Republic (.20); prepare for, then telephone call with Robert Millner on revisions to the Stipulation and Order, reviewing Robert Millner's E-Mails on proposed Stipulation and Order, and James Behrens's E-Mail on proposals for the Stipulation and Order (.20); telephone call with Robert Millner on proposed revisions (.20); telephone call to Ty Conner on Letter of Credit (.10); revise the Stipulation and Order, review, make one additional corrections and return for internal review (.20); review Tania Moyron's one change and two inserts, and make revisions (.20); review completed Stipulation and Order and transmit to multiple parties, also confirming latest Stipulation was transmitted (.30); exchange E-Mails with James Behrens on approval and E-Mail to Robert Millner on approval (.10); review Peg Anderson's voice mail and E-Mail, and telephone call with Ms. Anderson on reconciling the language, and E-Mails to Robert Millner and Tania Moyron on conference call (.20); exchange multiple E-Mails with Mr. Millner and Ms. Moyron setting up conference call with Peg Anderson (.20); review the Stipulation and Order, and E-Mail to Robert Millner on terms (.20); telephone conference call with Peg Anderson, Robert Millner and Tania Moyron on revising Stipulation (.20); prepare proposed revisions to Stipulation and forward to Mr. Millner (.20).
07/27/20	R. Richards	0.20	144.60	INS	Emails re Old Republic stipulation and other Marillac matters.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	R. Millner	0.20	160.00	INS	Telecon J. Moe re further drafting of stipulation re Old Republic administrative claim.
07/27/20	R. Millner	0.10	80.00	INS	Telecon T. Moyron et al re Old Republic stipulation.
07/27/20	R. Millner	0.50	400.00	INS	Review Opfman comments submitted by Chubb Insurance Co.
07/27/20	R. Millner	0.10	80.00	INS	Read email from P. Anderson (Old Republic) re administrative claim stipulation.
07/27/20	R. Millner	0.10	80.00	INS	Telecon J. Moe re Old Republic comments on stipulation re administrative claims.
07/27/20	R. Millner	0.20	160.00	INS	Telecon P. Anderson, T. Moyron and J. Moe re stipulation as to Old Republic administrative claim.
07/27/20	R. Millner	0.40	320.00	INS	Revise Old Republic stipulation as to administrative claim.
07/28/20	R. Millner	0.10	80.00	INS	Telecon J. Moe re Old Republic stipulation revisions.
07/28/20	R. Millner	0.10	80.00	INS	Review stipulation revisions from P. Anderson.
07/28/20	R. Millner	0.10	80.00	INS	Emails to J. Moe re further revisions to stipulation.
07/28/20	R. Millner	0.40	320.00	INS	Redraft stipulation re Old Republic administrative claim.
07/28/20	J.A. Moe, II	2.60	1,558.05	INS	/Old Republic/ Exchange E-Mails with Robert Millner on revised terms of the Stipulation and Order with Old Republic (.20); review Robert Millner's revisions to the Stipulation and Order and revise both (.30); review and edit the revised Stipulation and Order, then transmit to Robert Millner (.20); exchange E-Mails with Robert Millner on review of revised Stipulation and Order and possible additional language (.10); review Robert Millner's additional language and incorporate into the Stipulation (.40) ; review revised language, E-Mail to Robert Millner on languages and telephone call with Mr. Millner on language (.20); prepare Order, review, and transmit to Mr. Millner

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					and Tania Moyron (.10); E-Mails to Tania Moyron, then transmit to Old Republic's counsel, as well as James Behrens and Paul Ricotta (.20); review Peg Anderson's proposed revisions and review with Robert Millner and Tania Moyron (.20); brief telephone call with Tania Moyron, and E-Mail to Robert Millner obtaining authority to proceed (.10); telephone call to Peg Anderson on approval of changes, and E-Mail to Paul Ricotta and James Behrens transmitting updated Stipulation and Order (.20); prepare draft response to James Behren's question on the Stipulation (.40).
07/29/20	R. Millner	0.20	160.00	INS	Emails to Milbank et al re questions as to stipulation terms with Old Republic.
07/29/20	R. Millner	0.20	160.00	INS	Emails to J. Moe and T. Moyron re stipulation matters.
07/29/20	R. Millner	0.10	80.00	INS	Telecon J. Moe re stipulation finalization.
07/29/20	T. Moyron	0.40	239.70	INS	Analyze M. Shinderman, et al. correspondence re Old Republic (.2); analyze final stipulation (.1); analyze P. Anderson email and reply to same (.1).
07/29/20	J.A. Moe, II	1.50	898.88	INS	/Old Republic/ Review and exchange E-Mails with Robert Millner on responding to James Behrens and further revisions to the Stipulation (.40); telephone call with Robert Millner on two revisions to the Stipulation (.10); revise the Stipulation and forward to Robert Millner (.30); revise Order to conform to the Stipulation (.20); review Robert Millner's July 29th E-Mail to James Behrens and Paul Ricotta (.10); prepare E-Mail to James Behrens, Paul Ricotta, Mark Shinderman and Dan Bleck transmitting the revised Stipulation and Order and explaining two revisions (.40).
07/30/20	C. Montgomery	0.10	80.00	INS	Communications with T Moyron, L Wall and R Richards regarding Marillac actuarial review and sale process.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	R. Richards	2.30	1,662.90	INS	Review existing draft and comments on Marillac Stock Purchase Agreement (0.7); prepare new form of Marillac Stock Purchase Agreement (1.5); emails re motion and declaration in support of same with Geoff Miller (0.1).
07/30/20	T. Moyron	0.20	119.85	INS	Analyze, finalize Old Republic Stipulation and M. Shinderman et al., emails (.2).
07/30/20	S. Maizel	0.20	160.00	INS	Telephone conference with Mark Bennett re Marillac issues.
07/30/20	G. Miller	5.60	2,475.20	INS	Revise motion to approve Marillac sale.
07/30/20	T. Moyron	0.20	119.85	INS	Analyze matters related to expedited sale re Marrillac.
07/30/20	J. Fisher	0.50	189.00	INS	Marillac - review SPA drafts in preparation for resumption of sale process.
07/30/20	J.A. Moe, II	1.30	779.03	INS	/Old Republic/ Review procedures for filing Stipulation and uploading the Order, then telephone call to Travis Buckingham on Proof of Service (.10); internal calls on filing Stipulation, filing Proof of Service and uploading the Order (.20); review filed Stipulation and forward in two iterations to Travis Buckingham (.10); exchange E-Mails with Mr. Buckingham on Declaration Of Service, and internal telephone call on filing the Declaration(.10); await receipt of Declaration, receive Declaration, confer on the terms of the Order, review Order and approve for filing (.80).
07/30/20	J.A. Moe, II	1.20	719.10	INS	/Old Republic/ Review Peg Anderson's, Robert Millner's and Tania Moyron's E-Mails on Stipulation and Order (.10); review and compare versions of the Stipulation, and revise Ms. Anderson's version, and transmit to James Behrens, Mark Shinderman, Paul Ricotta and Dan Bleck (.60); telephone calls with Peg Anderson, Paul Ricotta and Mark Shinderman on revised Stipulation and Order (.30); transmit to Rich Adcock and Hope Levy-Biehl (.10); make one additional final non-substantive revision, and release for filing (.10).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	J. Fisher	1.00	378.00	INS	Marillac sale - review and revise SPA (0.5); review and revise ancillary agreements (0.3); conferences and correspondence (0.2).
07/31/20	G. Miller	5.00	2,210.00	INS	Revise motion to approve Marillac sale and draft declaration in support thereof.
07/31/20	R. Millner	0.20	160.00	INS	Email to R. Richards re Marillac sale.
	<b>Subtotal</b>	<b>83.00</b>	<b>55,459.51</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2313107

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B100	Administration	10,416.12
B110	Case Administration	5,769.41
B120	Asset Analysis and Recovery	4,638.81
B130	Asset Disposition	10,318.46
B140	Relief from Stay/Adequate Protection Proceedings	170.00
B150	Meetings of and Communications with Creditors	9,491.11
B160	Fee/Employment Applications	48,590.25
	Less Discount to Client	(7,040.00)
B180	Avoidance Action Analysis	4,611.64
B185	Assumption/Rejection of Leases and Contracts	2,697.06
B190	Other Contested Matters (excl. assumption/rejection motions)	2,276.77
B210	Business Operations	1,439.70
B220	Employee Benefits/Pension	21,640.38
B230	Financing/Cash Collections	5,810.12
B240	Tax Issues	7,750.30
B250	Real Estate	160.65
B300	Claims and Plan	91,620.15
B310	Claims Administration and Objections	25,519.54
B320	Plan and Disclosure Statement (incl. Business Plan)	118,052.95
B400	Bankruptcy-Related Advice	80.33
EMP	Employee matters	61,903.39
INS	Insurance	55,459.51
Total This Matter		\$481,376.65

Verity Health System of California, Inc.  
Invoice #: 2313107

August 30, 2020

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
B. Greer	\$800.00	1.00	\$800.00
C. Montgomery	\$800.00	90.30	\$72,240.00
O. Pinkas	\$800.00	0.40	\$320.00
S. Alberts	\$800.00	22.00	\$17,600.00
S. Maizel	\$800.00	30.70	\$24,560.00
S. Martin	\$760.75	0.40	\$304.30
L. Whidden	\$765.50	8.70	\$6,659.85
P. Maxcy	\$739.50	5.10	\$3,771.45
R. Richards	\$723.00	34.60	\$25,015.80
S. McCandless	\$799.00	18.20	\$14,541.80
T. Moyron	\$599.25	105.50	\$63,221.18
T. Santoli	\$799.00	9.70	\$7,750.30
J.A. Moe, II	\$599.25	101.20	\$60,644.68
K. Murphy	\$416.50	8.80	\$3,665.20
A. Ruegger	\$800.00	26.10	\$20,880.00
R. Millner	\$800.00	18.50	\$14,800.00
M. Zeefe	\$480.25	84.20	\$40,437.16
A. Shiran	\$514.50	18.70	\$9,621.15
C. Doherty, Jr.	\$374.00	0.30	\$112.20
E. Bass	\$548.25	0.80	\$438.60
G. Miller	\$442.00	23.30	\$10,298.60
J. Fisher	\$378.00	2.00	\$756.00
N. Koffroth	\$501.50	70.10	\$35,155.15
P. Flucke	\$501.50	15.80	\$7,923.70
D. Cook	\$471.76	16.30	\$7,689.69
E. Cobarrubias	\$267.75	0.30	\$80.33
D. Pina	\$318.75	14.80	\$4,717.52
G. Medina	\$293.25	51.30	\$15,043.78

Verity Health System of California, Inc.  
Invoice #: 2313107

August 30, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
K.M. Howard	\$250.75	76.60	\$19,207.56
M.M. Welch	\$267.75	<u>0.60</u>	<u>\$160.65</u>
Totals		856.30	\$488,416.65
Fee Total	\$ 481,376.65		
Invoice Total	<u>\$ 481,376.65</u>		

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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313101**

Client/Matter: 15800425-000003

Verity Health System of California

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Total This Invoice \$ 19,179.99

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Account Name: Dentons US LLP  
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S. Maizel  
at 1 213 623 9300



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USA

August 30, 2020

**Invoice No. 2313101**

Client/Matter: 15800425-000003

Verity Health System of California

### DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/30/2020	Corporate Fees CSC UCC Searches re St. Francis Medical Center	84.77
7/30/2020	Corporate Fees CSC UCC Search re Seton Medical Center; Inv 86109881925	78.78
7/30/2020	Corporate Fees CSC UCC Search re St. Vincent Dialysis Center Inc.	72.79
7/30/2020	Corporate Fees CSC UCC Searches re Verity Health System of California, Inc.	72.79
7/30/2020	Corporate Fees CSC UCC Searches re St. Vincent Medical Center	75.79
7/30/2020	Corporate Fees CSC UCC Searches re Verity Holdings LLC	72.79
	<b>SUBTOTAL</b>	<b>457.71</b>
7/8/2020	Filing Tania M. Moyron, Filing fee for Notice of Appeal in Verity v. SGM.	505.00
	<b>SUBTOTAL</b>	<b>505.00</b>
6/18/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/18/20 EFILING TO LASC 1860108STATEMENT RE STATUS	47.40
6/18/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/18/20 PDF CHAMBERS COPY NEXTDAY TO LASC 1860110STATEMENT RE STATUS	43.45
6/23/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/23/20 EFILING TO LASC 1861230CASE MANAGEMENT STMT	47.40
6/23/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/23/20 ESERVICE TO 5 EMAILS ON POS 1861233CASE MANAGEMENT STMT	35.00
6/23/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/23/20 PDF CHAMBER'S COPY SAMEDY TO LASC 1861235CASE MANAGEMENT STMT	37.75
6/8/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/08/20 PDF CHAMBERS COPY NEXTDAY TO COMPTON SUPERIOR COURT 1857525STATEMENT	67.38
7/22/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/22/20 PDF CHAMBER'S COPY RUSH TO SPRING STREET 1869046STATUS CONF STATEMEN	60.38

Verity Health System of California

August 30, 2020

Matter: 15800425-000003

Invoice No.: 2313101

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/22/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/22/20 EFILING TO LASC 1869050STATUS CONFERENCE STATEMENT	47.90
7/22/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/22/20 PDF CHAMBER'S COPY SAMEDY TO LASC 1869051STATUS CONFERENCE STATEMENT	42.53
7/2/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/02/20 EFILING TO LASC 1863884STATUS CONF STMT	37.75
7/24/2020	Filing Fees Tania M. Moyron, Attendance by David Galfus at May 27, 2020 hearing in Verity.	37.45
7/21/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/21/20 EFILING PRIORITY TO LASC 1868676CASE MGMT STMT	69.40
7/21/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/21/20 ESERVICE TO 1868677CASE MGMT STMT	35.00
7/21/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/21/20 PDF CHAMBER'S COPY RUSH TO LASC 1868678CASE MGMT STMT DEL CCJ D-19	59.13
7/22/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/22/20 EFILING PRIORITY TO LASC 1869043STATUS CONF STATEMEN	69.40
7/22/2020	Filing Fees ACE ATTORNEY INVOICE 335774 7/22/20 ESERVICE TO E-SERVE 1869044STATUS CONF STATEMEN	35.00
7/14/2020	Filing Fees Karleen F. Murphy, 6/30/20:AGUIRRE v SFMC - Copies of Court Docs (2 pages of the Complaint)	6.60
7/20/2020	Filing Fees Karleen F. Murphy, 7/20/20: LACOURT CONNECT: Diane Nguyen v. SFMC Status Conf.	15.00
7/24/2020	Filing Fees Tania M. Moyron, Attendance by David Galfus at April 22, 2020 hearing in Verity.	26.25
7/24/2020	Filing Fees Tania M. Moyron, Attendance by David Galfus at April 10, 2020 hearing in Verity.	37.45
7/24/2020	Filing Fees Tania M. Moyron, Attendance by David Galfus at April 9, 2020 hearing in Verity.	26.25
7/24/2020	Filing Fees Tania M. Moyron, Attendance by David Galfus at March 20, 2020 hearing in Verity.	37.45
7/27/2020	Filing Fees Samuel R. Maizel, Courtcall fees re March 20 telephonic hearing - Estevez.	37.45
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re March 20 telephonic hearing - Adcock.	37.45
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re March 20 telephonic hearing - Paul.	37.45

Verity Health System of California

August 30, 2020

Matter: 15800425-000003

Invoice No.: 2313101

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/30/2020	Filing Fees Karleen F. Murphy, 6/30/20:AGUIRRE v SFMC - Copies of Court Docs (2 pages of the Complaint)	2.00
6/30/2020	Filing Fees Karleen F. Murphy, 6/30/20:AGUIRRE v SFMC - Copies of Court Docs	2.00
6/30/2020	Filing Fees Karleen F. Murphy, OTIS VANN, JR. VS CHRISTOPHER G. GORING, ET AL.(download complaint)	4.00
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 9, 2020 telephonic hearing - Adcock.	31.85
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re July 8, 2020 telephonic hearing - Adcock.	31.85
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re May 27, 2020 telephonic hearing - Paul.	31.85
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re May 27, 2020 telephonic hearing - Adcock.	43.05
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 22, 2020 telephonic hearing - Paul.	26.25
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 22, 2020 telephonic hearing - Adcock.	26.25
7/15/2020	Filing Fees ACE ATTORNEY INVOICE 331662 7/15/20 PDF CHAMBERS COPY NEXTDAY TO LASC-COMPTON 1867143STATUS CONF	67.38
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re June 10, 2020 telephonic hearing - Adcock.	43.05
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 1, 2020 telephonic hearing - Adcock.	71.05
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 10, 2020 telephonic hearing - Paul.	37.45
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 10, 2020 telephonic hearing - Adcock.	37.45
7/24/2020	Filing Fees Samuel R. Maizel, Courtcall fees re April 9, 2020 telephonic hearing - Paul.	31.85
4/22/2020	Filing Fees Karleen F. Murphy, Cancel CourtCall re Frangis Khajekarrameddin v. SFMC Further Status Conference Statement	(54.00)
7/15/2020	Filing Fees John A. Moe, II, Transcript of hearing taken on July 15, 2020.	190.50
7/2/2020	Filing Fees ACE ATTORNEY INVOICE 331662 7/02/20 EFILING TO LASC 1863805CONT'D STATUS CONF	47.90



Verity Health System of California

August 30, 2020

Matter: 15800425-000003

Invoice No.: 2313101

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/2/2020	Filing Fees ACE ATTORNEY INVOICE 331662 7/02/20 EFILING PRIORITY TO LASC 1863874CONF STMT	59.25
7/9/2020	Filing Fees ACE ATTORNEY INVOICE 331662 7/09/20 PORTAL FEE TO SOUTH CENTRAL DISTRICT COMPTON1865210NOTICE OF STAY OF PR	16.90
7/15/2020	Filing Fees ACE ATTORNEY INVOICE 331662 7/15/20 EFILING PRIORITY TO LASC-COMPTON 1867091STATUS CONF	69.40
7/14/2020	Filing Fees Tania M. Moyron, Appearance of Sam Alberts by CourtCall for July 8, 2020 hearing.	31.85
7/14/2020	Filing Fees Tania M. Moyron, Appearance of Tania Moyron by CourtCall for July 8, 2020 hearing.	31.85
7/14/2020	Filing Fees Nicholas Koffroth, Appearance by Nick Koffroth by CourtCall at July 8, 2020 hearing.	31.85
7/16/2020	Filing Fees Karleen F. Murphy, COURTCALL Verity - Sprownson v. SFMC	94.00
4/29/2020	Filing Fees Karleen F. Murphy, Cancel CourtCall re Horton v. VMF Status Conference Statement	(54.00)
4/29/2020	Filing Fees Karleen F. Murphy, Cancel CourtCall re Dahl v. VMF Status Conference Statement	(54.00)
6/23/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/23/20 EFILING TO LASC 1861191CASE MANAGEMENT STAT	47.40
6/23/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/23/20 ESERVICE TO E-SERVE 1861192CASE MANAGEMENT STAT	35.00
6/23/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/23/20 PDF CHAMBERS COPY NEXTDAY TO LASC 1861194CASE MANAGEMENT STAT	39.50
6/30/2020	Filing Fees ACE ATTORNEY INVOICE 329659 6/30/20 PDF FILING ND TO SAN BERNARDINO SUP 1863179STATUS CONF STAT	69.68
7/14/2020	Filing Fees Tania M. Moyron, Appearance of Peter Chadwick by CourtCall for July 8, 2020 hearing.	31.85
7/14/2020	Filing Fees Tania M. Moyron, Appearance of Casey Doherty by CourtCall for July 8, 2020 hearing.	31.85
	SUBTOTAL	2,187.78
7/1/2020	Lexis MURPHY\ KARLEEN	151.99
7/6/2020	Lexis MONTGOMERY\ CLAUDE	424.15
7/7/2020	Lexis COOK\ DAVID	161.50
7/9/2020	Lexis MURPHY\ KARLEEN	2,119.07

Verity Health System of California

August 30, 2020

Matter: 15800425-000003

Invoice No.: 2313101

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/10/2020	Lexis MURPHY\ KARLEEN	635.72
7/13/2020	Lexis MURPHY\ KARLEEN	53.11
7/29/2020	Lexis MOYRON\ TANIA	51.06
7/29/2020	Lexis MOYRON\ TANIA	51.06
7/12/2020	Lexis SHIRAN\ ANNA	49.50
7/12/2020	Lexis SHIRAN\ ANNA	49.50
7/12/2020	Lexis SHIRAN\ ANNA	49.50
7/20/2020	Lexis MURPHY\ KARLEEN	212.23
7/20/2020	Lexis MURPHY\ KARLEEN	212.23
7/24/2020	Lexis MONTGOMERY\ CLAUDE	106.19
7/24/2020	Lexis MONTGOMERY\ CLAUDE	106.19
7/24/2020	Lexis MONTGOMERY\ CLAUDE	106.19
7/29/2020	Lexis MOYRON\ TANIA	51.06
7/13/2020	Lexis MURPHY\ KARLEEN	53.11
7/13/2020	Lexis MURPHY\ KARLEEN	53.11
7/19/2020	Lexis MONTGOMERY\ CLAUDE	53.10
7/19/2020	Lexis MONTGOMERY\ CLAUDE	53.10
7/19/2020	Lexis MONTGOMERY\ CLAUDE	53.10
7/20/2020	Lexis MURPHY\ KARLEEN	212.23
	SUBTOTAL	5,068.00
4/6/2020	LITIGATION SUPPORT VENDORS INVOICE 2637538-Q22020 PACER FEES	1,050.90
4/6/2020	LITIGATION SUPPORT VENDORS INVOICE 2637538-Q22020 PACER FEES	3.20
4/6/2020	LITIGATION SUPPORT VENDORS INVOICE 2637538-Q22020 PACER FEES	5.70
4/6/2020	LITIGATION SUPPORT VENDORS INVOICE 2637538-Q22020 PACER FEES	7.00
4/6/2020	LITIGATION SUPPORT VENDORS INVOICE 2637538-Q22020 PACER FEES	1.20
4/6/2020	LITIGATION SUPPORT VENDORS INVOICE 2637538-Q22020 PACER FEES	232.40

August 30, 2020

Matter: 15800425-000003

Invoice No.: 2313101

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/25/2020	LITIGATION SUPPORT VENDORS INVOICE 435862-Q22020 PACER FEES	1.00
	SUBTOTAL	1,301.40
	Print/Color Copies Color	16.00
	SUBTOTAL	16.00
	Print/Copies BW	3.60
	SUBTOTAL	3.60
7/1/2020	WESTLAW DOHERTY\CASEY	300.00
7/2/2020	WESTLAW DOHERTY\CASEY	375.00
7/5/2020	WESTLAW DOHERTY\CASEY	75.00
7/8/2020	WESTLAW ZEEFE\MALKA	150.00
7/8/2020	WESTLAW DOHERTY\CASEY	75.00
7/9/2020	WESTLAW KOFFROTH\NICHOLAS	129.50
7/27/2020	WESTLAW HSU \ ISABELLA	408.00
7/28/2020	WESTLAW HSU \ ISABELLA	347.00
7/29/2020	WESTLAW HSU \ ISABELLA	2,002.00
7/30/2020	WESTLAW HSU \ ISABELLA	122.00
7/31/2020	WESTLAW HSU \ ISABELLA	511.00
7/25/2020	WESTLAW BACON-SCHULTE \ CAMILLE	75.00
7/26/2020	WESTLAW BACON-SCHULTE \ CAMILLE	75.00
7/13/2020	WESTLAW HSU \ ISABELLA	75.00
7/14/2020	WESTLAW HSU \ ISABELLA	1,295.00
7/19/2020	WESTLAW HSU \ ISABELLA	1,680.00
7/20/2020	WESTLAW HSU \ ISABELLA	760.00
7/9/2020	WESTLAW ZEEFE\MALKA	150.00
7/12/2020	WESTLAW ZEEFE \ MALKA	375.00
7/21/2020	WESTLAW KOFFROTH \ NICHOLAS	61.00
7/21/2020	WESTLAW ZEEFE \ MALKA	75.00
7/22/2020	WESTLAW ZEEFE \ MALKA	150.00

Verity Health System of California

August 30, 2020

Matter: 15800425-000003

Invoice No.: 2313101

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/28/2020	WESTLAW ZEEFE \ MALKA	375.00
		SUBTOTAL 9,640.50
	Total Disbursements	\$19,179.99
	Disbursement Total	\$ 19,179.99
		<hr/>
	Invoice Total	<u>\$ 19,179.99</u>

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August 30, 2020

**Invoice No. 2313108**Matter: 15800425-000004  
O'Connor Hospital

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Account Name: Dentons US LLP  
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Reference Invoice # and/or client matter #

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at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313108**

---

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000004  
O'Connor Hospital

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	R. Garms	0.90	543.15	B130	Review and analyze purchase agreement regarding questions on sold assets (0.7); e-mails regarding same (0.2).
	<b>Subtotal</b>	<b>0.90</b>	<b>543.15</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2313108

August 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	K. Murphy	0.10	41.65	B190	/ Estrada / Analyze case update.
07/17/20	K. Murphy	0.20	83.30	B190	/ CT Corp -Sanoysan / Analyze CT Corporation notice of intent and download document, and analyze notice re unanswered subpoena (.1) and confer with Elina Tilman re the same (.1).
07/20/20	K. Murphy	0.10	41.65	B190	/ CT Corp -Sanoysan / Analyze email from Elina Tilman to Verity Team re CT Corp notice of unanswered subpoena.
07/20/20	K. Murphy	0.20	83.30	B190	/Cao / Analyze and respond to email from Karen Chapman with case update (.1) and analyze detailed case update with attachments (.1).
<b>Subtotal</b>		<b>0.60</b>	<b>249.90</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2313108

August 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	J.A. Moe, II	0.10	59.93	B300	In regard to the amount of Administrative Claims in connection with the Plan, review the series of E-Mails on amount due U.S. Foods (in regard to services to O'Connor and St. Louse and Invoices apparently paid in regard to Seton).
07/30/20	K. Murphy	0.10	41.65	B300	/ Greenwood / Telephone call with John Moe re estimated amount of SIR.
	<b>Subtotal</b>	<b>0.20</b>	<b>101.58</b>		



O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2313108

August 30, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/16/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails from Ken Wang re overpayment recovery by DHCS from escrow.
07/24/20	S. Maizel	0.50	400.00	MED/DHCS	Review and respond to emails from Ken Wang, Todd Schroeder, etc. re EHR reimbursement from sale escrow account.
07/29/20	S. Maizel	0.30	240.00	MED/DHCS	Review and respond to emails re DHCS demand against escrow deposit.
	<b>Subtotal</b>	<b>0.90</b>	<b>720.00</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2313108

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	543.15
B190	Other Contested Matters (excl. assumption/rejection motions)	249.90
B300	Claims and Plan	101.58
MED/DHCS	Medi-Cal/DHCS Issues	720.00
Total This Matter		\$1,614.63

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
S. Maizel	\$800.00	0.90	\$720.00
R. Garms	\$603.50	0.90	\$543.15
J.A. Moe, II	\$599.25	0.10	\$59.93
K. Murphy	\$416.50	<u>0.70</u>	<u>\$291.55</u>
Totals		2.60	\$1,614.63
Fee Total		\$ 1,614.63	
Invoice Total		<u>\$ 1,614.63</u>	

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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313109**

Matter: 15800425-000005  
St. Vincent Medical Center

Payment Due Upon Receipt

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Total This Invoice	\$ 13,416.97
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Chicago, IL 60604-6404

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227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
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Reference Invoice # and/or client matter #

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S. Maizel  
at 1 213 623 9300



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El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313109**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000005  
St. Vincent Medical Center

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/20	R. Westhoff	0.30	140.40	B130	Review and respond emails from R. Yesko and H. Levy-Biehl re: original real property deeds for hospital (.1); review issues re: same (.2).
07/08/20	A. Dondoyano	0.10	32.30	B130	Review email correspondence between R. Westhoff and DWT re property deeds.
07/09/20	R. Westhoff	0.10	46.80	B130	Review email from J. Davis re: original deeds.
07/27/20	T. Moyron	1.40	838.95	B130	Analyze email from J. Schlant and attached documents re QAF/EBIDTA (.3); conference call with BRG, R. Adcock, et al. re same (.5); follow up conference call regarding same (.5); exchange correspondence with 2005 advisors (.1).
	<b>Subtotal</b>	<b>1.90</b>	<b>1,058.45</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	R. Richards	0.20	144.60	B185	Emails re revisions to motion to reject contracts.
07/06/20	R. Richards	0.40	289.20	B185	Review comments on sixth omnibus motion to reject (0.2); revise and circulate same (0.2).
07/17/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Motion to Approve Compromise among St. Vincent, Central Health Plan and Seoul Medical Group and reviewed and revised Critical Dates Memorandum.
07/17/20	R. Richards	0.40	289.20	B185	Review comments on Sixth Omnibus Rejection Motion and exhibits (0.2); revise and circulate Sixth Omnibus Rejection Motion (0.2).
07/20/20	R. Richards	0.40	289.20	B185	Finalize Sixth Omnibus Motion to Reject.
	<b>Subtotal</b>	<b>1.80</b>	<b>1,112.50</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Marie Davis / Telephone call to counsel serving subpoena re stated production date (.1); and draft email to Verity Team re status of the same (.1).
07/01/20	K. Murphy	0.20	83.30	B190	/CT Corporation - David Dong / Analyze email notice from CT Corporation for service of medical record subpoena to SVMC, download and acknowledge subpoena and review subpoena (.1); and draft email to Verity Team re same. (.1).
07/01/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Matul / Analyze email notice from CT Corporation for service of medical record subpoena to SVMC, download and acknowledge subpoena and review subpoena (.1); and draft email to Verity Team re same. (.1).
07/01/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Marie Davis / Telephone call with counsel for party sending medical subpoena to come to agreement on date of production (.1); and draft email to Verity re update on the same (.1).
07/01/20	J.A. Moe, II	0.10	59.93	B190	/Marie David Subpoena/ Confer with Karleen Murphy, on insuring sufficient time to object and respond.
07/02/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Marie Davis / Telephone call with counsel for party sending medical subpoena to come to agreement on date of production (.1); and draft email to Verity re update on the same (.1).
07/06/20	K. Murphy	0.10	41.65	B190	/ Chow / Analyze email with update re judge preference for attending hearing on motion for summary judgment by court call and respond to the same.
07/08/20	K. Murphy	0.40	166.60	B190	/ CT Corp- Matul / Analyze CT Corp notice of medical record subpoena to SVMC, download, and acknowledge subpoena (.1); analyze subpoena and compare with prior subpoena previously served to CT Corp on 7/2/20 to determine if duplicative (.2); and draft email to Verity Team re the same (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/20	K. Murphy	0.10	41.65	B190	/ CT Corp- Joanna Batory / Analyze CT Corp notice of subpoena to SVMC, and analze and respond to email from Elina Tilman advising of handling the same.
07/08/20	K. Murphy	0.20	83.30	B190	/ Han / Analyze Superior Court website re case status and analyze entry for dismissal of VHS (.1); and draft email to Janee Tomlinson re case status as to SVMC (.1).
07/08/20	K. Murphy	0.20	83.30	B190	/ Perez / Analyze Superior Court website re case status and upcoming conference dates (.1); and prepare updates to Verity deadline charts with newly set conference dates (.1).
07/09/20	J.A. Moe, II	1.30	779.03	B190	/Susan Chow v. St. Vincent/ Attend hearing before Judge Monica Bachner in Department 71, via Court Call, on Motion For Summary Judgment.
07/09/20	K. Murphy	0.20	83.30	B190	/ CT Corp-Gloria Moreno / Analyze CT Corp notice of subpoena to SVMC, and download medical record subpoena (.1); analyze subpoena and draft email to Verity Team re the same (.1).
07/09/20	K. Murphy	0.10	41.65	B190	/ Phi / Prepare updae to Verity Chart with new date for Status Conference re Bankruptcy per court order of continuation.
07/14/20	K. Murphy	0.10	41.65	B190	/ Hadley / Analyze email from Karen Chapman enclosing case update re motion for summary judgment.
07/15/20	K. Murphy	0.10	41.65	B190	/ Ma / Analyze and respond to email from Karen Chapman with case update and analyze update.
07/23/20	K. Murphy	0.20	83.30	B190	/ CT Corp- Daniel Garcia / Analyze CT Corporation Notice re medical record subpoena, download document and analyze the same (.1); and draft email to Verity Team re same (.1).
07/24/20	K. Murphy	0.20	83.30	B190	/ CT Corp -Maria Davis / Analyze and respond to email from Kelly Pastor at Complex Legal Services re status of production of records pursuant to subpoena (.1) and draft email to Karen Chapman to determine status (.1).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	K. Murphy	0.20	83.30	B190	/ CT Corp- Jeong / Analyze CT Corporation Notice re medical record subpoena and email from Elina Tilman re the same (.1); download and analyze subpoena , and draft email to Verity team re the same (.1).
07/31/20	K. Murphy	0.10	41.65	B190	/ Siquian / Analyze email from Karen Chapman enclosing AIG email advising of report and pending decision on coverage.
07/31/20	K. Murphy	0.10	41.65	B190	/ Siquian / Prepare update to Verity Chart with reporting date information.
<b>Subtotal</b>		<b>4.70</b>	<b>2,213.41</b>		



St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/20	J.A. Moe, II	0.10	59.93	B310	/Doris Thompson v. St. Vincent/ Review the new Objection to the second Claim recently filed by Ms. Thompson.
07/16/20	J.A. Moe, II	0.30	179.78	B310	In regard to the reduction of large general unsecured claims, completely revise the Withdrawal Of Claim of Ok Ran Ma, and research on Claim filed with the Bankruptcy Court.
07/28/20	J.A. Moe, II	0.40	239.70	B310	In regard to the reduction of large general unsecured claims, review the Motion For Relief From Stay filed by Ok Ran Ma as to St. Vincent, the Stipulation and Order, then revise Withdrawal Of Claim of Ok Ran Ma (.30); E-Mail to and telephone call from Andres Estrada on identification of Claim (10).
07/29/20	J.A. Moe, II	0.40	239.70	B310	In regard to the reduction of large general unsecured claims: Make three revisions to the Withdrawal of Ok Ran Ma's Claim in the case of St. Vincent Medical Center (.20); revise the Withdrawal, then transmit with E-Mail to Benjamin Ikuta to execute the Stipulation and return (.20).
<b>Subtotal</b>		<b>1.20</b>	<b>719.11</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	S. Alberts	0.20	160.00	EMP	SVMC 1113. Email regarding status of CNA rejection stipulation.
07/10/20	S. McCandless	2.40	1,917.60	EMP	Communicate with L. Fernandez regarding response to NLRB charge and need for revision of same (.20); communicate with T. Moyron regarding same (.20); related detailed review of NLRB complaint and initial draft of answer (.70); review T. Moyron's related comments (.10); discuss and decide revisions with A. Youssefi (1.00); further revise and finalize same and forward to L. Fernandez (.20).
07/16/20	S. McCandless	0.30	239.70	EMP	Review employment claim: J. Moore.
	<b>Subtotal</b>	<b>2.90</b>	<b>2,317.30</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/03/20	S. Maizel	0.10	80.00	MED/CMS	Review and respond to email from CMS re overpayments.
07/06/20	T. Moyron	0.60	359.55	MED/CMS	Conference call with CMS re SVMC overpayment (.3); analyze emails from CMS regarding same (.2); analyze emails from H. Levy-Biehl, et al. re same (.1).
07/06/20	T. Moyron	0.20	119.85	MED/CMS	Analyze correspondence from S. Banks, et al. re Medicare overpayments.
07/06/20	S. Banks	0.90	581.40	MED/CMS	Analyze and provide input to S. Maizel regarding potential Medicare overpayment issue relating to biweekly payments of kidney acquisition pass-through costs (among others) to St. Vincent Medical Center.
07/06/20	S. Maizel	0.40	320.00	MED/CMS	Telephone conference with A. Belgrove and E. Levey re CMS overpayments.
07/06/20	S. Maizel	0.20	160.00	MED/CMS	Emails to BRG, etc. re CMS overpayment issues.
07/06/20	S. Maizel	0.10	80.00	MED/CMS	Telephone conference with R. Adcock re CMS overpayment issues.
07/07/20	H. Lutz	0.50	357.00	MED/CMS	Attention to PIP payments post-closing, review regulatory guidance (42 C.F.R. 489.55) regarding same, provide guidance per S. Maizel.
07/07/20	S. Banks	0.40	258.40	MED/CMS	Telephone conference with S. Maizel, et al., regarding CMS interim payments issue.
07/07/20	S. Maizel	0.90	720.00	MED/CMS	Telephone conference with Susan Banks, etc. re CMS overpayment demand (.4); telephone conference with R. Adcock, BRG, etc. re CMS overpayment demand (.5).
07/07/20	S. Maizel	0.80	640.00	MED/CMS	Telephone conference with E. Levey, A. Belgrove, etc. re CMS overpayment demand (.4); telephone conference with H. Levy-Biehl, P. Chadwick, etc. re CMS issues (.2); telephone conference with T. Moyron re CMS issues (.2).
07/08/20	S. Maizel	0.60	480.00	MED/CMS	Review and respond to emails re settlement with CMS.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	S. Maizel	0.80	640.00	MED/CMS	Telephone conference with CMS counsel re alleged overpayments (.7); telephone conference with H. Levy Biehl re same (.1).
07/09/20	S. Maizel	0.50	400.00	MED/CMS	Emails to CMS counsel re possible settlement, pending Medicare payments, etc.
07/13/20	S. Maizel	1.00	800.00	MED/CMS	Telephone conference with Counsel for CMS re alleged overpayment resolution (.4); telephone conference with H. Levy-Biehl and T. Moyron re same (.1); draft emails re settlement discussions to client (.5).
<b>Subtotal</b>		<b>8.00</b>	<b>5,996.20</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2313109

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	1,058.45
B185	Assumption/Rejection of Leases and Contracts	1,112.50
B190	Other Contested Matters (excl. assumption/rejection motions)	2,213.41
B310	Claims Administration and Objections	719.11
EMP	Employee matters	2,317.30
MED/CM S	Medicare/CMS Issues	5,996.20
Total This Matter		\$13,416.97

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
H. Lutz	\$714.00	0.50	\$357.00
S. Alberts	\$800.00	0.20	\$160.00
S. Maizel	\$800.00	5.40	\$4,320.00
R. Richards	\$723.00	1.40	\$1,012.20
R. Westhoff	\$468.00	0.40	\$187.20
S. Banks	\$646.00	1.30	\$839.80
S. McCandless	\$799.00	2.70	\$2,157.30
T. Moyron	\$599.25	2.20	\$1,318.35
J.A. Moe, II	\$599.25	2.60	\$1,558.07
K. Murphy	\$416.50	3.30	\$1,374.45
A. Dondoyano	\$323.00	0.10	\$32.30
K.M. Howard	\$250.75	<u>0.40</u>	<u>\$100.30</u>
Totals		20.50	\$13,416.97

St. Vincent Medical Center  
Invoice #: 2313109

August 30, 2020

Fee Total	\$	13,416.97
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Invoice Total	\$	<u>13,416.97</u>
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313110**Matter: 15800425-000006  
St. Francis Medical Center

Payment Due Upon Receipt

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Total This Invoice	\$ 245,630.85
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8000 Sears Tower  
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Account Name: Dentons US LLP  
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Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313110**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000006  
St. Francis Medical Center

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	S. Maizel	0.20	160.00	AGI	Review and respond to Prime's letter to the AG re additional acceptance.
07/16/20	T. Moyron	0.40	239.70	AGI	Correspond with H. Levy-Biehl, et al. re AG request (.2); conference call with R. Adcock, et al. re same (.2).
07/16/20	N. Koffroth	0.20	100.30	AGI	Participate in call re Attorney General conditions
07/16/20	S. Maizel	0.30	240.00	AGI	Telephone conference with T. Moyron re AG request for additional time (x2.).
07/16/20	S. Maizel	0.20	160.00	AGI	Review and respond to emails re S. Chan request for additional time for AG decision.
07/17/20	T. Moyron	1.40	838.95	AGI	Conference call with Prime, et al., re conditions (.6); conference call with S. Maizel re AG and other matters (.4); analyze AG conditional approval and conditions (.2); analyze related emails (.2).
07/17/20	S. Maizel	0.60	480.00	AGI	Telephone conference with Prime counsel re AG issues.
07/17/20	N. Koffroth	0.60	300.90	AGI	Participate in internal call re Attorney General conditions
07/17/20	N. Koffroth	2.40	1,203.60	AGI	Draft motion to enforce sale order re Additional Conditions
07/20/20	N. Koffroth	5.40	2,708.10	AGI	Draft motion to enforce sale order re Attorney General Additional Conditions
07/21/20	N. Koffroth	2.40	1,203.60	AGI	Draft motion to enforce sale order re Additional Conditions.
07/21/20	S. Maizel	0.10	80.00	AGI	Review Prime's letter to AG re materially more burdensome conditions.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	T. Moyron	1.00	599.25	AGI	Conference call with R. Adcock re Prime and other matters related to sale (.4); prepare email to Prime re AG conditions (.1); conference call with Prime, et al. re AG conditions (.4); prepare email to S. Chan re response (.1).
07/22/20	S. Maizel	0.40	320.00	AGI	Telephone conference with T. Moyron, etc. re AG conditions issues (.3); telephone conference with Prime re AG conditions (.1).
07/22/20	N. Koffroth	6.80	3,410.20	AGI	Draft motion to enforce sale order re Attorney General conditions.
07/22/20	N. Koffroth	0.40	200.60	AGI	Participate in call with counsel to Prime re response to AG conditions
07/23/20	N. Koffroth	2.90	1,454.35	AGI	Draft motion to enforce sale order re AG conditions.
07/24/20	T. Moyron	0.80	479.40	AGI	Conference call with J. Richlin and H. Levy-Biehl re AG and closing matters (.6); conference call with H. Levy-Biehl (.2).
07/24/20	N. Koffroth	7.10	3,560.65	AGI	Draft motion to enforce sale order re AG conditions
07/24/20	T. Moyron	0.90	539.33	AGI	Analyze J. Richlin email re AG (.1); prepare email to J. Richlin (.1); prepare email to D. Eldan (.1); analyze prior AG correspondence (.2); analyze and provide comments to AG motion (.4).
07/26/20	T. Moyron	0.90	539.33	AGI	Conference call with D. Eldan re inquiry related to affiliation agreement (.2); conference call with R. Adcock and D. Eldan re same (.4); conference calls with H. Levy-Biehl and D. Eldan re same (.3).
07/26/20	T. Moyron	0.50	299.63	AGI	Conference call with H. Levy-Biehl and J. Richlin re AG.
07/27/20	T. Moyron	0.60	359.55	AGI	Call with D. Eldan re certain conditions (.1), and follow up call with D. Eldan re same (.1); call with J. Richlin re same (.2); analyze H. Levy-Biehl correspondence re motion (.1); analyze J. Richlin email and redline (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	T. Moyron	3.50	2,097.38	AGI	Correspond with Prime re AG conditions (.2); analyze redline (.1); analyze motion and provide comments thereto (2.7); conference calls with R. Adcock re same (.1), (.1) (.1); prepare email to A. Estrada re motion (.1); analyze correspondence from D. Galfus (.1).
07/27/20	S. Maizel	0.30	240.00	AGI	Telephone conference with Nick Koffroth re enforcement motion (.2); telephone conference with T. Moyron re same (.1).
07/27/20	S. Maizel	0.60	480.00	AGI	Drafting insert for enforcement motion re AG conditions.
07/27/20	N. Koffroth	8.20	4,112.30	AGI	Draft emergency motion to sell free and clear of Attorney General conditions
07/28/20	N. Koffroth	6.60	3,309.90	AGI	Draft ex parte motion for reconsideration of order setting hearing on emergency motion to sell free and clear of AG conditions
07/28/20	T. Moyron	3.30	1,977.53	AGI	Analyze Court's order setting AG hearing on 8/12 (.1); call with D. Galfus re same (.1); call with BRG, R. Adcock, et al. re same (.7); calls with D. Bleck re same (.1), (.1); calls with Court (.2); call with R. Adcock (.1); analyze and prepare motion for reconsideration and analyze related matters (1.6); correspond with P. Chadwick and analyze language for declaration (.3).
07/28/20	T. Moyron	2.90	1,737.83	AGI	Conference call with S. Maizel re AG and issues related to hearing date (.2); calls with R. Adcock (.1), G. Gerltler (.2); P. Chadwick (.3); J. Richlin (.1); analyze email from E. Eldan (.1); prepare response thereto (.1); calls with P. Saba and M. Shinderman (.1) re motion support; finalize motion and declaration (1.4) and analyze standards (.3).
07/28/20	S. Maizel	0.70	560.00	AGI	Telephone conference with R. Adcock re hearing on AG Conditions.
07/28/20	S. Maizel	0.40	320.00	AGI	Review and respond to emails re hearing date on AG enforcement motion (.1); review and revise motion for reconsideration re hearing on AG enforcement motion (.3).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	N. Koffroth	0.60	300.90	AGI	Participate in internal call with R. Adcock, P. Chadwick, et al. re scheduling order concerning AG conditions motion.
07/29/20	M. Zeefe	0.30	144.08	AGI	Review documents re emergency motion re AG conditions.
07/29/20	T. Moyron	1.30	779.03	AGI	Analyze Court's order re AG hearing (.1); conference call with R. Adcock re same (.1); conference call with R. Adcock, BRG, et al. re Court's order and closing (.7); call with S. Maizel and R. Adcock re Prime and closing (.4).
07/30/20	N. Koffroth	7.50	3,761.25	AGI	Draft emergency motion to sell free and clear of Attorney General conditions
07/31/20	N. Koffroth	3.40	1,705.10	AGI	Draft emergency motion to approve sale free and clear of AG conditions
<b>Subtotal</b>		<b>76.10</b>	<b>41,002.74</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/03/20	T. Moyron	3.10	1,857.68	B130	Participate in call with UNAC re withdrawal of disputed items (.6); conference call with BRG, S. Alberts, etc. (.3); prepare supplement to reply and stipulation and finalize same (.9); conference call with S. Alberts re same (.1); exchange emails with counsel for UNAC re same (.3); analyze P. Chadwick declaration and prepare same (.4) and conference call with C. Doherty (.4); prepare emails to client re same (.1).
07/03/20	T. Moyron	1.00	599.25	B130	Conference call with R. Adcock, H. Levy-Biehl, et al. re Prime request as to certain employee information (.2); analyze BZBM emails re analysis (.2); correspond with H. Levy-Biehl re same (.2); calls with R. Adcock re same (.2); analyze further email from H. Levy-Biehl and respond to same (.1); analyze email from R. Adcock re call with Prime (.1).
07/03/20	S. Alberts	1.30	1,040.00	B130	SFMC. Review Primes statement concerning open discovery (.2), review materials in advance of call with UNAC on discovery (.3), conference with BRG and Dentons in advance of call with UNAC (.3), conference with UNAC regarding stipulation (.5).
07/07/20	A. Dondoyano	0.20	64.60	B130	Review Schedule 5.3 and confer with C.Johnson re same.
07/09/20	C. Montgomery	0.40	320.00	B130	Communications with S Maizel regarding union new buyer position (.1); communications with S McCandless and T Moyron regarding TSA issues and post effective date staffing (.3);
07/09/20	A. Dondoyano	0.30	96.90	B130	Review file re TSA, IMA and Sale Leaseback and email to M.Garms re same.
07/09/20	S. Maizel	0.70	560.00	B130	Telephone conference with BRG, Hope Levy Biehl, etc. re IMA issues.
07/09/20	R. Garms	1.10	663.85	B130	Call regarding Transition Services Agreement and IMA and review agreements in preparation for same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	S. Maizel	0.20	160.00	B130	Review and comment on draft of Prime memo to SFMC associates.
07/10/20	S. Maizel	0.20	160.00	B130	Review and respond to SGM email regarding being a back up bidder on SFMC.
07/10/20	S. Maizel	0.20	160.00	B130	Review and respond to email from G. Gertler re revising by laws after sale closes.
07/10/20	T. Moyron	1.10	659.18	B130	Conference call with Prime, R. Adock, et al. re labor matters and transition (.8); conference call with H. Levy-Biehl and R. Adock re labor matters (.3).
07/10/20	S. Alberts	0.10	80.00	B130	SFMC. Email about Prime and union dispute and next steps.
07/11/20	C. Montgomery	0.10	80.00	B130	Communications with S Maizel and R Adcock re Prime employee communication.
07/13/20	A. Dondoyano	0.70	226.10	B130	Revise closing checklist (0.4); Confer with client and T.Moyron re closing checklist calls (0.3).
07/13/20	C. Montgomery	0.30	240.00	B130	Communications with R Adcock regarding Prime employee communications (.1); Communications with A Dondoyano and P Chadwick regarding closing checklist and review same (.2)
07/13/20	R. Westhoff	0.20	93.60	B130	Review draft closing checklist re: real estate items for closing (.1); review email from P. Chadwick re: same (.1).
07/14/20	A. Dondoyano	2.00	646.00	B130	Revise closing checklist and draft various closing documents.
07/14/20	S. Maizel	0.20	160.00	B130	Telephone conference with Joe Kohanski re UNAC issues.
07/14/20	S. Maizel	0.40	320.00	B130	Telephone conference with R. Adcock, H. Kevane, BRG, etc. re Aetna claims.
07/14/20	T. Moyron	0.80	479.40	B130	Analyze final orders and notice of lodgment (.3); analyze UNAC, et al., correspondence (.3); conference call with UNAC re order (.2).
07/15/20	A. Dondoyano	0.10	32.30	B130	Revise closing checklist.
07/16/20	A. Dondoyano	0.50	161.50	B130	Emails to M.Garms re TSA (0.2); Revise closing checklist (0.3).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/16/20	T. Moyron	0.50	299.63	B130	Call with A. Dondoyano re closing checklist (.1); analyze correspondence with N. Nguyen, et al. re closing checklist (.1); correspondend with P. Chadwick re same (.1); analyze closing checklist (.2).
07/17/20	T. Moyron	0.70	419.48	B130	Conference call with Prime, et al. re closing checklist call (.5); conference call with P. Chadwick re sale status (.2).
07/17/20	N. Koffroth	0.50	250.75	B130	Participate in closing checklist call with counsel to Prime
07/17/20	S. Maizel	0.40	320.00	B130	Telephone conference with T. Moyron re sale issues.
07/17/20	R. Westhoff	0.40	187.20	B130	Review strategy for preparation of ancillary real estate closing documents (.2); coordinate same (.1); review email from L. Kmiec re: outstanding title clearance matter (.1).
07/17/20	A. Dondoyano	2.80	904.40	B130	Review closing checklist in preparation for closing checklist call and attend the same (0.7); Draft various closing documents (1.9); Confer with title company re closing items (0.2).
07/17/20	R. Garms	0.60	362.10	B130	Closing checklist call and follow up regarding same.
07/20/20	R. Garms	1.10	663.85	B130	Review Transition Services Agreement exhibits (0.8); e-mails regarding transaction follow up (0.3).
07/20/20	A. Dondoyano	3.00	969.00	B130	Draft various closing documents and confer with R.Westhoff re same (2.2); Revise closing checklist (0.8).
07/20/20	S. Alberts	0.30	240.00	B130	Conference with T. Moyron about status of closing and SEIU non-applications for jobs (.1) and follow up on whether it is intended to prevent closing (.2).
07/20/20	R. Westhoff	0.50	234.00	B130	Review closing agenda and outstanding title clearance items (.2); review strategy re: resolving same (.3).
07/21/20	A. Dondoyano	3.90	1,259.70	B130	Draft various closing documents (2.9); Closing checklist call and revise closing checklist (1.0)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	S. Maizel	0.10	80.00	B130	Review and respond to emails from G. Gertler re GME issue.
07/21/20	S. Maizel	0.30	240.00	B130	Telephone conference with Prime re sale issues.
07/21/20	N. Koffroth	0.40	200.60	B130	Participate in closing checklist call with counsel to Prime
07/21/20	R. Westhoff	1.10	514.80	B130	Review emails from N. Nguyen re: title items raised by C. Olson and updated checklist (.2); review same (.2); review emails from N. Nguyen and A. Estrada re: mechanic's lien issues (.1); review draft Owner's Affidavit and GAP Undertaking (.2); review email from N. Nguyen re: request for copies of Notices of Non-Responsibility (.1); review issues re: Section 5912 of the CA Corporations Code (.3).
07/21/20	R. Garms	1.90	1,146.65	B130	Review closing documents (0.8); closing checklist call and follow up regarding same (0.7); e-mails regarding open transaction items (0.4).
07/22/20	R. Garms	1.20	724.20	B130	Review purchase agreement and ancillary documents regarding insurance questions (0.8); e-mails regarding transaction issues (0.4).
07/22/20	C. Montgomery	0.10	80.00	B130	Communications with T Moyron regarding 1146 issues and Prime inquiry.
07/22/20	A. Dondoyano	1.40	452.20	B130	Draft various closing documents (1.1); Update closing checklist and circulate to closing checklist call group (0.3).
07/22/20	S. Alberts	1.30	1,040.00	B130	Review and comment on term sheet (.2), follow up emails concerning term sheet (.2), conference with working group about terms sheet (.7), draft insert for term sheet (.2).
07/22/20	T. Moyron	1.90	1,138.58	B130	Analyze correspondence from H. Levy-Biehl, et al., and attachments re release of employee benefits (.4); respond to same (.1); conference call with R. Adcock, et al. re same (.6); conference call with Prime re AG (.4); analyze matters related to AG motion (.3); prepare email re same (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	R. Westhoff	2.30	1,076.40	B130	Review title commitment for Notices of Non-Responsibility filed by MOB ground lessor (.2); gather same (.1); emails to/from N. Nguyen re: same (.1); review revised form Owner's Affidavit and exhibit disclosures re: capital improvement projects (.4); prepare comments re: same (.3); email to N. Nguyen re: same (.1); review and respond to email from N. Nguyen re: additional outstanding project (.1); review issues and prior correspondence re: same (.3); review issues and strategy for handling mechanic's lien claims (.4); review email from N. Nguyen re: board resolutions (.1); review same (.2).
07/22/20	R. Millner	0.20	160.00	B130	Email to T. Connor, T. Moyron et al re St. Francis APA language.
07/22/20	S. Maizel	0.50	400.00	B130	Telephone conference with Prime re GME issues.
07/23/20	T. Moyron	1.00	599.25	B130	Conference call with Prime, et al. re closing checklist call (.4); prepare email to S. Chan (.1); analyze responses thereto (.1); analyze H. Levy-Biehl, et al., re Prime letters (.3); prepare emails regarding same (.1).
07/23/20	N. Koffroth	0.40	200.60	B130	Participate in Prime closing checklist call
07/23/20	S. Maizel	1.00	800.00	B130	Telephone conference with R. Adcock, BRG, etc. re union issues.
07/23/20	S. Maizel	0.40	320.00	B130	Telephone conference with Prime, etc. re closing checklist.
07/23/20	R. Westhoff	1.20	561.60	B130	Review and respond to emails from N. Nguyen re: revised Owner's Affidavit and Gap Undertaking (.2); review issues re: uninsured transfer to Verity Holdings (.2); review strategy re: resolving same (.2). telephone call from G. Fierman re: request to deed hospital directly to landlord for sale/leaseback transaction (.3); review email from G. Fierman re: same (.2); review issues re: same (.1).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	A. Dondoyano	2.60	839.80	B130	Draft various closing documents (1.0); Compile responses to title company questions (0.9); Closing checklist call and revise closing checklist (0.7).
07/23/20	R. Garms	2.20	1,327.70	B130	Closing checklist call (0.4); review purchase agreement and respond to questions (0.6); review real estate documents and questions (1.2).
07/23/20	T. Moyron	1.60	958.80	B130	Correspond regarding sale and administration matters.
07/24/20	A. Dondoyano	0.10	32.30	B130	Revise closing checklist.
07/24/20	R. Garms	2.50	1,508.75	B130	Review Transition Services Agreement and IMA questions (0.7); review and comment on closing documents (1.4); call and follow up regarding closing items (0.4).
07/24/20	T. Moyron	0.50	299.63	B130	Analyze H. Levy-et al., emails re Prime re employees matters (.2); analyze A. Ruda email emails re UNAC correspondence (.2); analyze H. Levy-Biehl email re AG and respond to same (.1).
07/24/20	T. Moyron	0.20	119.85	B130	Analyze email from J. Schlant, et al. re Section 5.8(c) of the SFMC-Prime APA.
07/24/20	R. Westhoff	1.10	514.80	B130	Coordinate review of California transfer tax issues (.5); review Asset Purchase Agreement re: same (.3) telephone calls to/from H. Levy-Biehl re: closing timing and outstanding deal issues (.3).
07/24/20	C. Bacon-Schulte	1.10	532.95	B130	Review and respond to emails from R. Westhoff re: analysis of transfer tax implications of sale/leaseback structure (.2); begin researching California's treatment of sale/leaseback real property dispositions re: transfer taxes and liability for payment and non-payment of same (.9).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/25/20	T. Moyron	1.60	958.80	B130	Conference call with R. Adcock regarding open matters related to St. Francis, employee benefits, AG, etc. (.7); analyze UNAC email and release (.2); prepare email regarding closing and employee matters (.2); analyze matters related to MPT and deed (.2); prepare email to P. Chadwick, et al. re call (.1); further correspondence with A. Ruda, et al. re benefits and correspondence (.2).
07/25/20	C. Bacon-Schulte	2.70	1,308.15	B130	Research California's treatment of sale/leaseback real property dispositions re: transfer taxes and liability for payment and non-payment of same.
07/25/20	R. Westhoff	0.30	140.40	B130	Review research re: transfer tax issues in connection with direct deed to MPT (.2); coordinate follow up re: same (.1)
07/25/20	A. Dondoyano	0.20	64.60	B130	Email to M.Garms re SGM APA and related disclosure schedules and exhibits.
07/25/20	S. Maizel	0.50	400.00	B130	Telephone conference with H. Levy Biehl re TSA issues.
07/26/20	S. Maizel	0.50	400.00	B130	Telephone conference with BRG, Cain Bros., etc. re MPT/Prime issues.
07/26/20	S. Maizel	0.50	400.00	B130	Review and revise motion to enforce Prime sale order.
07/26/20	R. Westhoff	0.90	421.20	B130	Prepare for and participate in internal working group call re: Prime request to transfer directly to MPT (.7); handle follow-up re: same (.2).
07/26/20	C. Bacon-Schulte	3.30	1,598.85	B130	Complete research of California's treatment of sale/leaseback real property dispositions re: transfer taxes and liability for payment and non-payment of same (0.4); prepare written analysis re: Los Angeles County's treatment of transfer taxes in sale/leaseback transactions and potential risk related to payment and non-payment of same and provide analysis to R. Westhoff (2.9).
07/26/20	C. Montgomery	0.70	560.00	B130	Participate in phone conference with P Chadwick, D Galfus, H Levy-Biehl, S Maizel, T Moyron, J Moloney regarding IMA and MPT issues.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/20	C. Montgomery	0.10	80.00	B130	Communications with T Moyron regarding Premier rejection question.
07/26/20	T. Moyron	0.30	179.78	B130	Analyze employment matters.
07/26/20	T. Moyron	0.70	419.48	B130	Conference call with Cain, BRG, M. Garms, et al. re MPT.
07/26/20	R. Garms	2.10	1,267.35	B130	Review SGM purchase agreement regarding deposit provisions and call regarding same (0.7); call regarding financing and follow up regarding same (0.6); work on closing documents (0.8).
07/27/20	R. Garms	3.80	2,293.30	B130	Review and revise closing documents (1.8); internal open items call and follow up regarding same (0.6); call regarding purchase agreement questions and review purchase agreement regarding same (1.4).
07/27/20	T. Moyron	0.10	59.93	B130	Correspond with Cain, et al. re MPT conference call.
07/27/20	T. Moyron	0.80	479.40	B130	Conference call with J. Richlin re benefits and employment related matters (.2); correspond with J. Richlin re same (.2); analyze redline (.1); correspond with R. Adcock re same (.2); correspond with A. Ruda, et al., re same (.1).
07/27/20	S. Maizel	0.50	400.00	B130	Telephone conference with BRG re QAF issues.
07/27/20	S. Maizel	0.50	400.00	B130	Telephone conference with R. Adcock, etc. re QAF issues.
07/27/20	A. Dondoyano	0.80	258.40	B130	Revise closing checklist (0.3); Review MWE comments to various ancillary closing documents (0.5).
07/27/20	G. Medina	0.80	234.60	B130	Call and communication with N. Koffroth regarding filing (0.1); review and file Emergency motion For The Entry of an Order Enforcing The Order Authorizing The Sale To Prime Healthcare Services, Inc. (0.3); download and send to Client, Co-Counsel, Dentons Team and BRG (0.4).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	C. Montgomery	2.00	1,600.00	B130	Communications with T Moyron, : RE: Prime 1146 request (.1) Communications with T Moyron, J Schlant, P Chadwick regarding : St. Francis - QAF (.1) phone call with J Emerson re Prime QAF (.2); Communications with T Moyron regarding 1146 issues and Prime inquiry (.1); communications with P Chadwick, T Moyron, D Galfus regarding Attorney General Conditions motion (.2); phone cal with M Garms and J Schlant regarding Prime QAF issues (.5); participate in conference call with R Adcock, Chadwick, T Moyron. M Garms regarding QAF and EBITDA issues (.5); participate in conference call P Ricotta M Shinderman, T Moyron, J Reich regarding 1146 issue (.3)
07/27/20	R. Westhoff	0.70	327.60	B130	Review and respond to emails from J. Maloney, H. Levy-Biehl, and P. Chadwick re: scheduling call with Prime and MPT re: deed transfer issues (.2); review title and lien issues (.4); review strategy and timing for closing (.1).
07/28/20	R. Westhoff	1.20	561.60	B130	Attend conference call re: Prime and MPT sale leaseback structure (.7); follow-up re: same (.1); review email from L. Kmiec re: comments to draft owner's affidavit (.1); review emails from N. Nguyen re: same (.1); review revised draft re: same (.2).
07/28/20	K.M. Howard	0.60	150.45	B130	Analysis of the Order Setting Hearing on Debtors' Emergency Enforcement Motion regarding the Sale to Prime Healthcare and reviewed and revised Critical Dates Memorandum.
07/28/20	C. Montgomery	0.10	80.00	B130	Communications with J Moloney regarding unsolicited offer for SFMC.
07/28/20	N. Koffroth	0.50	250.75	B130	Participate in closing checklist call with counsel to Prime
07/28/20	T. Moyron	0.80	479.40	B130	Conference call with MPT, BRG, Cain, et al. re closing (.7); call with R. Adcock re same (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	A. Dondoyano	1.40	452.20	B130	Closing checklist call and revise closing checklist (0.5); Review MWE drafts of various closing documents and revise the same (0.9).
07/28/20	S. Maizel	0.60	480.00	B130	Telephone conference with R. Adcock, etc. re MPT issues.
07/28/20	S. Maizel	0.70	560.00	B130	Telephone conference with Mintz, etc. re QAF/EBIDTA issues.
07/28/20	S. Maizel	0.80	640.00	B130	Telephone conference with K. Wang re revisions to DHCS settlement agreement (.4); email to J. Richlin, etc. re same (.1); email to H. Levy-Biehl re same (.3).
07/28/20	R. Garms	5.60	3,379.60	B130	Prepare for and attend call regarding sale leaseback structure (0.6); call regarding purchase agreement issues and follow up regarding same (0.7); call regarding closing and follow up regarding same (0.6); review and revise closing documents (1.9); review offer and documents from J. Moloney (0.7); review and analyze IMA and SLA revisions (1.1).
07/29/20	R. Garms	4.50	2,715.75	B130	Review and comment on revised closing documents (2.8); call regarding open items for closing and follow up regarding same (0.9); e-mails regarding open transaction matters (0.8).
07/29/20	T. Moyron	0.40	239.70	B130	Conference call with Verity, BRG, AHMC, et al. re Seton Closing Checklist.
07/29/20	T. Moyron	0.60	359.55	B130	Call with S. Maizel re Order, Prime and closing (.1); call with S. Maizel, D. Galfus, and P. Chadwick re Prime and closing (.5).
07/29/20	N. Koffroth	0.80	401.20	B130	Participate in call concerning motion for reconsideration with R. Adcock, P. Chadwick, et al.
07/29/20	C. Montgomery	1.20	960.00	B130	Participate in Verity internal closing checklist call (.4); communications regarding lock box issues with T Moyron and H Levy-Biehl (.1); phone call S Maizel regarding Scheduling Order (.1); participate in phone conference with P Chadwick, R Adcock, S Maizel re impact of AG order on closing (.6)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	R. Westhoff	0.70	327.60	B130	Review outstanding title clearance matters (.4); review strategy for resolving same (.3).
07/29/20	T. Moyron	0.50	299.63	B130	Conference call with J. Richlin re AG and closing (.3); analyze P. Chadwick, et al. re emails (.2).
07/29/20	T. Moyron	0.20	119.85	B130	Analyze email from counsel for Premier (.1) and prepare emails re same (.1).
07/29/20	T. Moyron	1.20	719.10	B130	Conference call with J. Richlin re matters related to closing logistics (.4); conference call with R. Adcock re same (.5); call with S. Maizel re same (.3).
07/29/20	S. Maizel	0.10	80.00	B130	Telephone conference with T. Moyron re closing issues.
07/29/20	S. Maizel	2.00	1,600.00	B130	Telephone conference with BRG, R. Adcock, etc. AG enforcement motion (.8); telephone conference with T. Moyron and R. Adcock, re same (.5); telephone conference with BRG and T. Moyron re same (.7).
07/29/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re closing issues.
07/29/20	S. Maizel	0.10	80.00	B130	Telephone conference with T. Moyron re sale issues.
07/29/20	A. Dondoyano	2.10	678.30	B130	Confer with title company re closing items (0.5); Revise closing checklist (0.5); Review MWE's drafts of various closing documents and revise the same (1.1).
07/30/20	T. Moyron	0.30	179.78	B130	Analyze email from H. Levy-Biehl re Prime/MPT (.1); prepare responses to H. Levy-Biehl (.1); prepare email to G. Gertler (.1).
07/30/20	T. Moyron	3.60	2,157.30	B130	Conference call with BRG, S. Maizel et al., re closing, APA and related issues (.8); conference call with Prime, BRG and R. Adcock re TSA (.7); closing checklist call with Prime, et al. (.6); call with Mintz re closing status, APA, etc. (1.0); call with BRG and C. Richter et al., re liens and UCC (.3); analyze J. Shlant emails et al., re closing matters (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	S. Maizel	0.80	640.00	B130	Telephone conference with Prime, etc. re closing checklist.
07/30/20	S. Maizel	0.90	720.00	B130	Telephone conference with BRG, etc. re sale closing issues.
07/30/20	C. Richter	0.20	129.20	B130	Call with J. Emerson re sale and lease matters.
07/30/20	C. Richter	0.20	129.20	B130	Review emails regarding same.
07/30/20	C. Richter	0.70	452.20	B130	Participate in conference call with client and Dentons team.
07/30/20	R. Westhoff	3.00	1,404.00	B130	Internal call re: owner's affidavit issues and strategy (.3); prepare for upcoming closing checklist call (.4); review current closing checklist (.2); attend closing checklist call with Prime, et al. (.6); review revised Grant Deeds (.5); review issues and strategy re: same (.3); review email from H. Levy-Biehl re: issues in deeding real property directly to MPT (.2); review AG letter re: same (.2); review strategy for addressing same (.3).
07/30/20	C. Montgomery	1.50	1,200.00	B130	Phone call with J Emerson regarding lien search and termination statement issues (.1); communications with M Welch re same (.1); communications with M Welch and J Emerson regarding UCC lien closing checklist issues (.2); participate in phone conference with C Richter, M Welch, T Moyron J Emerson regarding UCC lien release issues (.3); participate in phone conference with T Moyron, M Garms, S Maizel, P Chadwick, D Galfus re closing issues (.8)
07/30/20	N. Koffroth	0.80	401.20	B130	Participate in call re closing issues with counsel to Prime
07/30/20	N. Koffroth	0.30	150.45	B130	Participate in call with P. Chadwick, J. Emerson, et al. re UCC lien search issues
07/30/20	R. Garms	6.90	4,164.15	B130	Call regarding Transition Services Agreement and prepare for same (1.2); calls regarding closing issues and follow up regarding same (1.4); review, analyze and draft summary of purchase agreement issues and call regarding same (2.8); work on closing documents (1.1); review and analyze AG questions (0.4).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	A. Dondoyano	4.10	1,324.30	B130	Confer with title company re closing items (0.5); Closing checklist call and revise closing checklist (0.9); Review MWE's drafts of various closing documents and revise the same (2.3); Internal call re UCC-3 Financing and Payoff Letters (0.4).
07/31/20	A. Dondoyano	1.00	323.00	B130	Review MWE's drafts of various closing documents (0.6); Revise closing checklist (0.4).
07/31/20	R. Garms	4.10	2,474.35	B130	Internal closing issues call and follow up regarding same (1.5); work on closing documents (1.6); review and analyze draft closing statement (0.6); review comments to sale leaseback (0.4).
07/31/20	S. Maizel	0.50	400.00	B130	Telephone conference with T. Moyron, etc. re sale issues.
07/31/20	S. Maizel	0.40	320.00	B130	Telephone conference with R. Adcock, BRG, etc. re sale closing issues.
07/31/20	N. Koffroth	0.60	300.90	B130	Conference call with T. Moyron re closing matters
07/31/20	N. Koffroth	0.40	200.60	B130	Participate in call with P. Chadwick, T. Moyron, et al. re IT issues
07/31/20	T. Moyron	0.50	299.63	B130	Conference call with N. Koffroth re closing matters.
07/31/20	T. Moyron	0.20	119.85	B130	Analyze T. Conner, P. Chadwick et al., emails re accounts.
07/31/20	R. Westhoff	1.00	468.00	B130	Review issues re: Grant Deeds (.4); review email from M. Pfeiffer re: MPT's environmental reliance letter (.1); review same (.4); emails to/from M. Pfeiffer re: same (.1).
07/31/20	T. Moyron	2.00	1,198.50	B130	Call with J. Richlin re IT (.2); call with P. Chadwick re same (.1); Call with P. Chadwick and H. Levy-Biehl (.4) re IT; conference call with Prime, P. Chadwick, et al. (.2); conference call with P. Richlin re labor matters (.1); analyze release and comments thereto (.2); correspond with R. Adcock et al. re same (.3); exchange emails with J. Richlin re same (.1); conference call with R. Adcock (.4) re labor matters.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	T. Moyron	1.50	898.88	B130	Call with P. Chadwick re call with Prime re IT (.1); call with R. Adcock and H. Levy-Biehl re closing and IT (.2); call with H. Levy-Biehl and J. Richlin (.5); call with R. Adcock, BRG, et al. re closing and IT (.3); call with H. Levy-Biehl re same (.1). analyze H. Levy-Biehl emails re IT (.3).
<b>Subtotal</b>		<b>145.30</b>	<b>80,921.94</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	J.A. Moe, II	0.10	59.93	B140	/Phillips Medical/ E-Mails to Marshall Goldberg confirming that the contract will be rejected and that equipment will be picked up, and requesting confirmation that equipment will be picked up.
07/02/20	J.A. Moe, II	0.20	119.85	B140	/Phillips Medical/ Exchange E-Mails with Marshal Goldberg on Phillip picking up equipment, and commence work identifying term for a continuance of the Motion For Relief Fro Stay.
07/04/20	J.A. Moe, II	0.10	59.93	B140	/Phillips Medical Capital/ In regard to the Motion For Relief From Stay, revise first draft of the Stipulation and Order.
07/06/20	J.A. Moe, II	0.30	179.78	B140	/Phillips Medical Capital/ Complete revisions to the Stipulation and Order and forward for completion (.10); exchange E-Mails with Tania Moyron on Stipulation with Phillips Medical on continuance of the hearing (.10); review the revised Notice and Order and E-Mail for internal review, and telephone call to Marshal Goldberg on continuance (.10).
07/07/20	J.A. Moe, II	0.50	299.63	B140	/Phillips Medical Capital/ Exchange E-Mails with Tania Moyron and E-Mail the Stipulation and proposed Order to Marshall Goldberg (.10); review Marshall Goldberg's E-Mail and telephone call on correction (.10); revise Stipulation and Order to conform to each other and confirm hearing date (.20); review revised Stipulation and Order, transmit to Marshall Goldberg, and additional exchange of E-Mails with Mr. Goldberg on proceeding (.10).
07/07/20	T. Moyron	0.20	119.85	B140	Analyze Phillips stipulation and order (.1); analyze related correspondence (.1).
07/09/20	K.M. Howard	0.40	100.30	B140	Analysis of the Stipulation between Debtors and Philips Medical continuing the hearing and applicable deadlines regarding Philips' Motion for Relief from Stay and reviewed and revised Critical Dates Memorandum.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	J.A. Moe, II	0.10	59.93	B140	/Phillips Medical Capital/ Review status and dates of former Response, Reply and date for hearing.
07/14/20	K. Murphy	0.10	41.65	B140	/ Nguyen / Telephone call with John Moe re recent filing of motion for relief from automatic stay.
07/14/20	J.A. Moe, II	0.50	299.63	B140	/Natalie Nguyen v. St. Francis/ Review Motion For Relief From Stay (.10); commence research on background to the Claim (.20); confer with Karleen Murphy on Notice served upon and Claim filed by Natalie Nguyen (.10); make three additional changes to the Mediation Brief (.10).
07/15/20	J.A. Moe, II	0.50	299.63	B140	/Natalie Nguyen v. St. Francis/ Review with Karleen Murphy additional evidence for the Opposition to Motion For Relief From Stay (.10); prepare draft of the Declaration in support of the Opposition (.20); prepare draft of the Opposition (.20).
07/15/20	K. Murphy	0.60	249.90	B140	/ Natalie Nguyen / Assist John Moe with opposition to Plaintiff's Motion for Relief From Automatic Stay by determining filing date for small claims matter (.1); confer with John Moe re assignment (.1); conduct research on all eight proofs of claims to determine if filing date (.3); and draft email to John Moe with results of search (.1)
07/16/20	J.A. Moe, II	0.40	239.70	B140	/Mariabelen Basulto v. St. Francis/ Telephone call from Nicole Podgurski on Stipulation for relief from stay, and receipt of Ballot (.10); confirm with Peter Chadwick the authority to proceed, and transmit Stipulation for internal review (.10) revise the Stipulation and forward for internal review (.20).
07/16/20	J.A. Moe, II	0.20	119.85	B140	/Eduardo Vasquez v. St. Francis/ In response to E-Mail, commence work on Order, then review proffered Order on approval of Stipulation.
07/16/20	K.M. Howard	0.40	100.30	B140	Analysis of Philips Medical's Notice of Withdrawal of Motion for Relief from Stay and reviewed and revised Critical Dates Memorandum.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	J.A. Moe, II	0.30	179.78	B140	/Natalie Nguyen v. St. Francis/ Revise first draft of the Response and Opposition to the Motion For Relief From Stay filed by Natalie Nguyen (.20); transmit Motion to Elspeth Paul and Peter Chadwick for their review (.10).
07/17/20	K. Murphy	1.10	458.15	B140	/ Nguyen / Confer with John Moe re case research on duplicative matters for opposition to plaintiff's Motion for Relief from Automatic Stay (.1); and conduct research re same (1.0).
07/17/20	K. Murphy	0.10	41.65	B140	/Natalie Nguyen / Analyze email from John Moe enclosing Plaintiff's Motion for Relief from Automatic Stay.
07/19/20	J.A. Moe, II	0.60	359.55	B140	/Natalie Nguyen v. St. Francis/ Revise second draft of the Response And Opposition to the Motion For Relief From Stay, and commence identifying Pleadings to be cited in and identify Exhibits to be attached to the Response/Opposition.
07/20/20	J.A. Moe, II	2.90	1,737.83	B140	/Natalie Nguyen v. St. Francis/ Review and assemble Exhibits for the Response And Opposition to the Motion For Relief From Stay (.10); review revised Response And Oppsition, to be updated (.10); confer with Karlen Murphy on possible insert (.10); revise -- through five iterations -- the draft of the Response And Opposition (1.40); confer with Kathryn Howard on and research service of the Motion (.20); research prohibition to use of false statements in bankruptcy (.40); confer with Karleen Murphy on two actions pending at once, then review research and revise the Response And Opposition to include research and an additional minor revisions (.40); review, make four revisions, and reformat one argument (.20).
07/20/20	J.A. Moe, II	0.20	119.85	B140	/Mariabelen Basulto v. St. Francis/ Review Stipulation and draft Order, revise the Order, and review current version of the Stipulation and Order.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	K.M. Howard	0.60	150.45	B140	Reviewed Motion for Relief from Stay filed in Natalie Nguyen v. St. Francis Medical Center and reviewed and revised Critical Dates Memorandum (.4); conferred with J. Moe regarding same (.1); email exchange regarding same (.1).
07/21/20	J.A. Moe, II	0.60	359.55	B140	/Natalie Nguyen v. St. Francis/ Additional research on prohibition to party having two lawsuits pending against same party on same facts at the same time (.40); confer with Elina Tilman on status of Natalie Nguyen's Motion For Relief From Stay, and wage and hour claims (.20).
07/21/20	J.A. Moe, II	0.30	179.78	B140	/Eduardo Vazquez v. St. Francis/ Consider the Claim filed by Eduardo Vazquez, then revise paragraph in the proposed Order on identifying the Claim being withdrawn (.20); exchange E-Mails on completing the Order, then E-Mail to Andres Estrada on identifying the Claim (.10).
07/22/20	J.A. Moe, II	0.60	359.55	B140	/Eduardo Vazquez v. St. Francis/ Review E-Mail from Andres Estrada on Claim identification and transmit for revision the Order on Stipulation, then complete Order and transmit for revision (.20); review uploaded Order and E-Mail on necessity to refer to both Claim designations (.10); revise last paragraph of the Order, review revised Order and approve for uploading (10); telephone call to the Clerk on amended Order (.20).
07/22/20	J.A. Moe, II	0.60	359.55	B140	/Mariabelen Basulto v. St. Francis/ Exchange E-Mails with Nicole Podgurski on completing Stipulation (.10); review and revise the Stipulation and proposed Order, and transmit for revisions (.30); review and make three minor revisions to the Stipulation Order, and then transmit to Ms. Podgurski (.20).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	J.A. Moe, II	0.50	299.63	B140	/Eduardo Vazquez v. St. Francis/ Review Clerk's response to inquiry on Amended Order, then telephone call from Clerk, on process for filing the Amended Order (.20); prepare Amended Order for uploading with the Court (.20); review entered Order and transmit to Karleen Murphy, and E-Mail to Ms. Murphy on supplementing the Chart (.10)..
07/27/20	J.A. Moe, II	0.10	59.93	B140	/Phillips Medical/ Confirm Withdrawal of the Motion For Relief From Stay.
07/30/20	J.A. Moe, II	0.10	59.93	B140	/Natalie Nguyen v. St. Francis/ Review with Karleen Murphy a proposed call with Elina Tilman and review upcoming hearing on Motion, then send time and date for hearing to Ms.Murphy.
07/31/20	K. Murphy	0.40	166.60	B140	/ Natalie Nguyen / Telephone call with John Moe discussing tentative ruling on Plaintiff's Motion For Relief From Automatic Stay (.1); and further telephone call with Elina Tilman and John Moe re case status to prepare for upcoming Non-Appearance Case Review based on tentative ruling on Motion for Relief From Automatic Stay (.3).
07/31/20	J.A. Moe, II	0.70	419.48	B140	/Natalie Nguyen v. St. Francis/ Review Judge Robles' Tentative Ruling on Motion For Relief From Stay (.10); confer with Karleen Murphy on results of Motion (.20); conference call with Elina Tilman and Karleen Murphy on how to proceed now in the Superior Court and Small Claims Court Cases (.40).
<b>Subtotal</b>		<b>14.30</b>	<b>7,661.12</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	C. Richter	1.00	646.00	B185	Call with J. Emerson with BRG to discuss Uniform Commercial Code lease assumption and administrative claims relating to equipment leases, and assignments and assumption of equipment leases, for the sale of St. Francis Hospital and Seton Medical Center.
07/23/20	J.A. Moe, II	0.20	119.85	B185	/Scan Health/ Exchange E-Mails with Henry Kevane on rejection of SCAN Contracts, and review of E-Mail from Dan Besikoff (.10); E-Mail to Mr. Besikoff on procedures (.10).
07/24/20	J.A. Moe, II	0.30	179.78	B185	/SCAN Health/ Exchange E-Mails with Attorney Dan Besikoff on likely rejection of Contracts and next steps for SCAN Health (.10); telephone call with Dan Besikoff on reaching agreement on payments due SCAN Health (.20).
07/27/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Motion to Reject to Risk-Sharing Agreement with Healthcare LA and reviewed and revised Critical Dates Memorandum.
07/27/20	K.M. Howard	0.20	50.15	B185	Reviewed and revised Critical Dates Memorandum regarding all deadlines applicable to Cigna.
07/30/20	C. Montgomery	0.70	560.00	B185	Review Premier response to motion to reject (.2); review motion to reject (.1); review historical settlement agreement and agreement list and communications with T Moyron re same (.3); communications with T Ingman re same (.1)
07/31/20	R. Richards	1.20	867.60	B185	Emails re rejection of contracts and leases buyers of St. Francis and Seton do not want assigned to them (0.2); prepare seventh omnibus motion to reject (1.0).
<b>Subtotal</b>		<b>4.00</b>	<b>2,523.68</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K.M. Howard	0.40	100.30	B190	Analysis of ruling regarding the mediated settlement in Carcamo v. St. Francis and reviewed and revised Litigation Management Chart.
07/01/20	J.A. Moe, II	0.10	59.93	B190	/Navarro v. St.Francis/ Review proposed Case Management Conference Statement, and telephone call with Karleen Murphy on two minor revisions to the Statement.
07/01/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review and approve proposed Case Management Conference Statement.
07/01/20	J.A. Moe, II	0.10	59.93	B190	/Sonniah Ahinasi v. St. Francis/ Review proposed Joinder in the Case Management Conference and confer with Karleen Murphy on BZBM not filing a Statement.
07/01/20	J.A. Moe, II	0.10	59.93	B190	/Leonard Harris v. St. Francis/ Telephone call with Karleen Murphy on continuing research on issues revolving around amending a Proof of Claim.
07/01/20	K. Murphy	0.10	41.65	B190	/ Nguyen / Draft email to John Moe re status of filing Notice of Automatic Stay.
07/01/20	K. Murphy	0.10	41.65	B190	/ Diane Nguyen / Draft email to Elina Tilman and John Moe enclosing draft of Status Conference Statement for review.
07/01/20	K. Murphy	0.30	124.95	B190	/ Navarro / Analyze court website to confirm date Status Conference Statement re Bankruptcy going forward, date of filing of Notice of Automatic Stay, and analyze email report from last conference to prepare for drafting updated conference statement (.2); and draft Status Conference Statement re Bankruptcy (.1);
07/01/20	K. Murphy	0.10	41.65	B190	/ Navarro / Confer with John Moe on edits to draft of Status Conference Statement re Bankruptcy and finalize the same.
07/01/20	K. Murphy	0.10	41.65	B190	/ Ahinasi / Telephone call to Elina Tilman re Ms. Tilman's draft of Status Conference Statement and analyze email re instructions for upcoming conference.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K. Murphy	0.30	124.95	B190	/ Aguirre / Analyze multiple emails from Karen Chapman, Kathy Conway, and Mike Gonzalez re confirmation of date of incident and assignment of litigation counsel for post-petition claim (.1); draft response email to Mr. Gonzalez re no Notice of Automatic Stay because post petition incident (.1); and update Verity Charts with incident and litigation counsel assignment. (.1).
07/02/20	J.A. Moe, II	0.10	59.93	B190	/Rafael Aguirre v. St. Francis/ Confer with Karleen Murphy in lapse on representation, and assignment of Michael Gonzalez as counsel.
07/06/20	J.A. Moe, II	0.10	59.93	B190	/Cynthia Sorto v. St. Francis/ Review with Elina Tilman the background to and analysis regarding Cynthia Sorto proceeding with Litigation (and insuring Ms. Sorto receives new Bar Date Notice).
07/06/20	K. Murphy	0.10	41.65	B190	/ Ancira / Analyze email with case updates from litigation defense counsel, Jessica Cynowic.
07/06/20	K. Murphy	0.10	41.65	B190	/ Diane Nguyen / Draft follow up email to John Moe re status of Notice of Automatic Stay in Superior Court matter.
07/06/20	J.A. Moe, II	0.10	59.93	B190	/Leonard Harris v. St. Francis/ In regard to the upcoming Mediation, review with Karleen Murphy the necessity to complete the Memorandum Of Law.
07/06/20	J.A. Moe, II	0.10	59.93	B190	/Sonniah Ahinasi v. St. Francis/ Review E-Mail on proposed Case Management Conference Statement, E-Mail on making Special Appearance, and subsequent E-Mail confirming no Statement is being filed by BZBM.
07/06/20	J.A. Moe, II	0.10	59.93	B190	/Brian Braun v. St. Francis/ Review Ruling on Motion For Summary Judgment in favor of Gary Tomlinson, and forward to Karleen Murphy.
07/06/20	J.A. Moe, II	0.10	59.93	B190	/Diane Nguyen v. St. Francis/ Review proposed Statement to be filed by BZBM, and recommend making a Special Appearance.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review with Karleen Murphy the status of the Notice of Stay (on July 2nd), and exchange E-Mails with Kathryn Howard (on July 6th) on preparing and filing the Notice of Stay .
07/06/20	K.M. Howard	0.30	75.23	B190	Reviewed Litigation Management Chart regarding the cases filed by Natalie Nguyen against St. Francis (.2); email exchange with J. Moe regarding same (.1).
07/07/20	K. Murphy	0.10	41.65	B190	/ Sorto / Analyze and respond to email from Karen Chapman enclosing case summary and analyze case summary.
07/07/20	K. Murphy	0.20	83.30	B190	/ Braun / Analyze incoming mail re notice of ruling re co-defendant's motion for summary judgment (.1); analyze matter to determine if case has relief from automatic stay and draft email to John Moe re the same (.1).
07/07/20	K. Murphy	0.10	41.65	B190	/ Ancira / Analyze and respond to email from Karen Chapman with case update and analyze update re Plaintiff's seeking preferential trial date.
07/07/20	K. Murphy	0.10	41.65	B190	/ Salah / Analyze and respond to email from Karen Chapman with case update.
07/07/20	K. Murphy	0.10	41.65	B190	/ Braun / Analyze fax from US Legal Support re co-defendant's subpoena of records and draft response email to John Moe re the same.
07/07/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze and respond to email from John Moe enclosing co-defendant Health Net's case discovery to Plaintiffs re case status as to SFMC.
07/07/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze multiple emails from co-defendant Health Net enclosing sets of discovery to each Plaintiff in the case.
07/07/20	K.M. Howard	0.70	175.53	B190	Reviewed complaint and summons in Natalie Nguyen v. St. Francis (.2); reviewed docket (.1); prepared Notice of Stay of Proceedings and proof of service (.3); prepared email to J. Moe (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	J.A. Moe, II	0.40	239.70	B190	/Leonard Harris v. St. Francis/ Conference call with An Ruda, Elina Tilman, Luzann Fernandez and Tania Moyron, on background and defenses to the causes of action, including issues related to the Debtor and to the individual defendants.
07/07/20	J.A. Moe, II	0.10	59.93	B190	/Susan Chow v. St. Francis/ Review E-Mail from Janee Tomlinson on upcoming Motion For Summary Judgment, and internal conference on court call appearance.
07/07/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Confer with Kathryn Howard on creating and process for completing the Notice Of Stay.
07/08/20	J.A. Moe, II	0.20	119.85	B190	/Natalie Nguyen v. St. Francis/ Review and approve the completed Notice Of Stay with attachments, to file in the Superior Court, then exchange E-Mails with Elina Tilman on Notice Of Stay filed.
07/08/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen / Analyze email from John Moe re confirmation of filing of Notice of Automatic Stay in Superior Court matter (.1); and prepare update to Verity Litigation Management chart to add new Superior Court matter and date for filing Notice of Automatic Stay (.1).
07/08/20	K. Murphy	0.20	83.30	B190	/ Sorto / Analyze Superior Court website re case status and upcoming conference dates (.1); and prepare updates to Verity deadline charts with newly set conference dates (.1).
07/08/20	K. Murphy	0.10	41.65	B190	/ Watson / Analyze Superior Court website re case status and prepare updates to Verity deadline charts re no future hearings on calendar.
07/09/20	J.A. Moe, II	0.70	419.48	B190	/Leonard Harris v. St. Francis/ Review Karleen Murphy's E-Mail, review Case, and return E-Mail on legal authority on requirements for amending a Claim (.20); second and third conference calls with Ms. Murphy on theories to be espoused in Memorandum Of Law (.50);

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	J.A. Moe, II	0.10	59.93	B190	/Myung Soo Han v. St. Francis/ Review E-Mails on background to the case, and exchange E-Mails with Karleen Murphy on terms of settlement.
07/09/20	J.A. Moe, II	0.20	119.85	B190	/Aaron Raj v. St. Francis/ Review revised letter to Nelida Contreras, and telephone call from Elina Tilman on status of revised letter (.10); review revised letter, make one additional change, then transmit to Elina Tilman for review (.10).
07/09/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Exchange E-Mails with Elina Tilman on Memoranda Of Law for the Mediation (.10); telephone call from Ms.Tilman discussing Memoranda Of Law (.10).
07/09/20	K. Murphy	0.40	166.60	B190	/ Sprownson / Analyze court website to confirm upcoming Status Conference re Bankruptcy and prior report to prepare for drafting Status Conference Statement (.1); draft Status Conference Statement for 7/30/20 (.2); and draft email to John Moe enclosing draft for review and analyze response (.1).
07/09/20	K. Murphy	6.90	2,873.85	B190	/ Harris / Analyze John Moe's draft mediation brief re bankruptcy issues (.1); telephone call with John Moe re research project re issue of amended proof of claim must relate back to initial proof of claim (.7); conduct research re the same (5.0); further telephone calls with John Moe re results of research (.2); prepare initial draft section of Mediation Brief re standard for amending proof of claim (.7); and prepare further edits based on calls with John Moe (.2).
07/10/20	K. Murphy	0.10	41.65	B190	/ Harris / Shepardize cases for Mediation Brief.
07/10/20	K. Murphy	0.30	124.95	B190	/ Harris / Telephone call with John Moe re preparation of edits to KFM draft of insert in Mediation Brief re amended proof of claim.
07/10/20	J.A. Moe, II	0.10	59.93	B190	/Leonard Harris v. St. Francis/ Telephone call with Karleen Murphy, on the requirements for amending or prohibitions to amending Claims and review of additional authority.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	J.A. Moe, II	0.70	419.48	B190	/Leonard Harris v. St. Francis/ Telephone conference with Rich Adcock, other representatives of Verity, Attorneys from the Bartko Firm, other Denton's attorneys and representatives of BRG, on background facts, analysis of the case and how to proceed, and timing on the administration of the bankruptcy case (.40); second telephone call with Ms. Ruda, Ms. Levy-Biehl, Ms. Fernandez and Ms. Moyron on how to proceed with the Leonard Harris Case, and necessity to identify other significant cases for Verity (.30).
07/10/20	J.A. Moe, II	0.50	299.63	B190	/Leonard Harris v. St. Francis/ Review with Karleen Murphy the Mediation Memorandum Of Law on amendment to Claims, making revisions to additions to the Memorandum (.30); review and transmit Memorandum to Elina Tilman, then telephone call with Ms. Tilman and Ms. Murphy on whether to submit Memorandum to Opposing Counsel (.20).
07/13/20	K. Murphy	1.60	666.40	B190	/ Ahinasi / Prepare for attending Status Conference Statement re Bankruptcy by analyzing statements of SFMC and Plaintiff (.1); attend conference (1.3); draft report to Verity Team (.1) and analyze and respond to email from Karen Chapman re nature of the case (.1).
07/13/20	J.A. Moe, II	0.70	419.48	B190	/Aaron Raj v. St. Francis/ Review letter to Nelida Contreras, then identify Exhibits, then transmit letter and Exhibits to Elina Tilman for concurrent review (.30); exchange E-Mails and telephone call with Elina Tilman on letter (.10); revise letter and identify better copies of the Exhibits (.30).
07/13/20	J.A. Moe, II	0.40	239.70	B190	/Leonard Harris v. St. Francis/ Review and make minor revision to the Mediation Brief, then identify Exhibits, then transmit to Elina Tilman and Karleen Murphy for review before submission to the Mediator (.20); telephone call to Karleen Murphy on completing the Mediation Brief (.10); identify improved version of the Exhibits (.10).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/20	J.A. Moe, II	0.10	59.93	B190	/Tommy Sprowson v. St. Francis/ Review and approve Case Management Conference Statement.
07/13/20	J.A. Moe, II	0.10	59.93	B190	/Sonniah Ahinasi v. St. Francis/ Review the Case Management Conference Statement filed by Plaintiff's Counsel, and brief telephone call with Karleen Murphy on results of the hearing.
07/13/20	K.M. Howard	0.20	50.15	B190	Reviewed summary of status conference in Ahinasi v. St. Francis Medical Center and reviewed and revised Litigation Management Chart.
07/13/20	K.M. Howard	0.40	100.30	B190	Reviewed correspondence to plaintiff's counsel in Aaron Raj v. St. Francis Medical Center and reviewed and revised Litigation Management.
07/14/20	K. Murphy	0.10	41.65	B190	/ Harris / Telephone call with John Moe re proof of claim.
07/14/20	K. Murphy	0.20	83.30	B190	/ Harris / Telephone call with Elina Tilman re mediation brief, and analyze and respond to emails from Elina Tilman re the same. .
07/14/20	K. Murphy	0.40	166.60	B190	/ Harris / Analyze multiple emails from An Ruda, Hope Levy Biel and Richard Adcock re inclusion of VMF in settlement agreement (.2); further confer with An Ruda re clarification of next steps (.1); and analyze and respond to follow up email from Plaintiff's counsel re the same (.1).
07/14/20	J.A. Moe, II	0.10	59.93	B190	/Diane Nguyen v. St. Francis/ Review notice of Non Appearance Case Review and E-Mail to Karleen Murphy on upcoming conference.
07/14/20	J.A. Moe, II	0.70	419.48	B190	/Leonard Harris v. St. Francis/ Telephone call with Elina Tilman on changes to the Mediation Brief (.20); make five minor revisions to the Mediation Brief and add an Exhibit "D" (.20) ; confer with Karleen Murphy on Proof of Claim (.10); telephone call to Elina Tilman on the Proof Of Claim, review Proof Of Claim and add as an Exhibit to the Memorandum (.20).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

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07/14/20	J.A. Moe, II	0.10	59.93	B190	/Mariabelen Basulto v. St. Francis/ Exchange E-Mails with Nicole Podgurski, and prepare Memorandum to Dentons' and Verity seeking approval to proceed with settlement on Motion For Relief From Stay.
07/15/20	J.A. Moe, II	0.10	59.93	B190	/Ancira Mateo v. St. Francis/ Review multiple E-Mails from Karen Chapman and from Superior Court Counsel on status of the case and parameters of a Mediation.
07/15/20	K. Murphy	0.10	41.65	B190	/ Sprownson / Analyze and respond to email from Laurie Soledad re identification of co-defendant for service of Status Conference Statement Re Bankruptcy.
07/15/20	K. Murphy	0.10	41.65	B190	/Ancira Mateo / Analyze email from Karen Chapman with case update from litigation counsel, Jessica Cynowicz, and analyze case update.
07/16/20	J.A. Moe, II	0.10	59.93	B190	/Leonard Harris v. St. Francis/ Commence preparing for the Mediation, including exchanging E-Mails with Elina Tilman and An Ruda on preparation
07/17/20	K. Murphy	0.10	41.65	B190	/ Navarro / Analyze and respond to email from Sam Maizel with cc'd attorney requesting copy of SFMC Status Conference Statement.
07/17/20	K. Murphy	0.30	124.95	B190	/ Morataya / Telephone call with John Moe, including adding Karen Chapman to call, to discuss case status.
07/17/20	K. Murphy	0.20	83.30	B190	/ CT Corp -Monaco / Analyze two CT Corporation notices of subpoena for employment records, download subpoenas, and analyzed the same (.1): and confer with Elina Tilman re the same (.1).
07/17/20	K. Murphy	0.10	41.65	B190	/ Harris / Prepare updates to all Verity Charts based on case settlement.
07/17/20	J.A. Moe, II	9.30	5,573.03	B190	/Leonard Harris v. St. Francis/ Attend, with Luzann Fernandez and An Ruda, and with representative of AIG, and before Mediator, the Mediation on the claims of Leonard Harris against St. Francis (9.20); confer with Ms. Fernandez, Ms. Ruda and Rich Adcock on Mr. Adcock's approval of the Settlement Agreement (.10);

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	T. Moyron	0.20	119.85	B190	Analyze A. Ruda, et al. emails re Harris mediation.
07/17/20	K.M. Howard	0.40	100.30	B190	Reviewed email summarizing status conference and reviewed the court's notice of rescheduling and reviewed and revised Litigation Management Chart.
07/19/20	J.A. Moe, II	0.10	59.93	B190	/Diane Nguyen v. St. Francis/ Review notice on Case Management Conference and exchange E-Mails with Karleen Murphy on preparation for conference going forward on July 20th.
07/20/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze co-defendant Omnicare/Health Net's Status Conference Statement.
07/20/20	J.A. Moe, II	0.30	179.78	B190	/Leonard Harris v. St. Francis/ Telephone call with Elina Tilman on settlement of Claims and payment (.10); identify and preliminarily review the Motion and Order permitting payment of the SIR (.20).
07/20/20	K. Murphy	0.70	291.55	B190	/Diane Nguyen / Prepare for attending Status Conference re Bankruptcy by analyzing Status Conference Statement (.1); attend conference (.3); prepare report to Verity Team and update to Verity Deadline Chart (.1); and confer with Plaintiff's counsel re notice for continued conference by phone and email (.2).
07/20/20	K. Murphy	0.10	41.65	B190	/Iniguez / Analyze and respond to email from Karen Chapman with case update and analyze update.
07/20/20	K. Murphy	0.10	41.65	B190	/ CT Corp -Monaco / Analyze email from Elina Tilman to Verity Team re CT Corp employment records subpoena.
07/21/20	S. Maizel	0.20	160.00	B190	Telephone conference with counsel for Verity in Navarro v. SFMC (.1); emails to J. Moe, etc. re same (.1).
07/21/20	K. Murphy	0.20	83.30	B190	/ Aragon / Analyze LA Superior Court Website to confirm upcoming Status Conference (.1); and draft Status Conference Statement with email to John Moe enclosing the same (.1).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	K. Murphy	0.20	83.30	B190	/ Durham / Analyze LA Superior Court Website to confirm upcoming Status Conference (.1); and draft Status Conference Statement with email to John Moe enclosing the same (.1).
07/21/20	K. Murphy	0.30	124.95	B190	/ Morataya / Confer with John Moe re status of discussions with plaintiffs' counsel on relief from the automatic stay (.2); and prepare edits to draft of Status Conference Statement (.1).
07/21/20	K. Murphy	0.10	41.65	B190	/ Nguyen / Confer with John Moe re case status.
07/21/20	J.A. Moe, II	0.10	59.93	B190	/Richard Navarro v. St. Francis/ Review multiple E-Mails from Sam Maizel, Karleen Murphy and Aaron Weissman on Case Management Conference Statement, and E-Mail to Karleen Murphy on CMC to Mr. Weissman.
07/22/20	J.A. Moe, II	0.10	59.93	B190	/Breta Durham v. St. Francis/ Review proposed Case Management Conference Statement and E-Mail to Karleen Murphy on filing of the Statement.
07/22/20	J.A. Moe, II	0.10	59.93	B190	/Jasmine Aragon v. St. Francis/ Review proposed Case Management Conference Statement, and E-Mail to Karleen Murphy on filing Statement.
07/22/20	J.A. Moe, II	0.40	239.70	B190	/Leonard Harris v. St. Francis/ Prepare detailed E-Mail to Tania Moyron and Sam Maizel on settlement of the Leonard Harris Case.
07/22/20	K. Murphy	0.10	41.65	B190	/ Durham / Analyze email from John Moe approving draft of Status Conference Statement and draft email to Laurie Soledad re the same.
07/22/20	K. Murphy	0.10	41.65	B190	/ Aragon / Analyze email from John Moe approving draft of Status Conference Statement and draft email to Laurie Soledad re the same.
07/22/20	K. Murphy	0.10	41.65	B190	/Natalie Nguyen / Analyze and respond to email from Elspeth Paul re nature of plaintiff's claim.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	K. Murphy	0.20	83.30	B190	/ CT Corp -Douang / Analyze CT Corporation notice of subpoena (.1); and analyze email from Elina Tilman to Verity Team re the same (.1).
07/22/20	K. Murphy	0.10	41.65	B190	/ Aragon / Analyze and respond to email from Elina Tilman enclosing SFMC's Bankruptcy Status Conference Statement.
07/23/20	K. Murphy	1.50	624.75	B190	/Richard Navarro / Prepare for attending Status Conference re Bankruptcy by analyzing conference statement (.1); attend conference (1.1); prepare report (.1); and telephone call with litigation counsel, Aaron Weissman and John Moe following call (.1); and prepare update to Verity Deadline Chart (.1).
07/23/20	K. Murphy	0.10	41.65	B190	/Woolum / Analyze email from Karen Chapman enclosing settlement demand.
07/23/20	K. Murphy	0.10	41.65	B190	/Richard Navarro / Analyze and respond to email from litigation counsel enclosing Notice of Continued Status Conference and analyze enclosed Notice.
07/23/20	J.A. Moe, II	0.20	119.85	B190	/Jasmine Aragon v. St. Francis/ Review E-Mails on Case Management Conference Statements and appearance at Conference, by and between Elina Tilman and Karleen Murphy, then E-Mail to Ms. Murphy and Ms. Tilman on appearance; review the filed CMC Statement (.10); exchange E-Mails with Ms. Murphy and E-Mail to Ms. Tilman on responsibilities (.10).
07/23/20	J.A. Moe, II	0.10	59.93	B190	/Dale Woolom v. St. Francis/ Review Karen Chapman's E-Mail, and review letter from Plaintiff's counsel on allegations against and settlement offer to St. Francis.
07/23/20	J.A. Moe, II	0.20	119.85	B190	/Richard Navarro v. St. Francis/ Telephone calls from Karleen Murphy on appearance at the Status Conference, and issues addressed at the Conference and with Mr. Weissman.
07/23/20	J.A. Moe, II	0.10	59.93	B190	/Ramona Webb v. Verity/ Telephone call with Elina Tilman on, and review Claim filed by Ramona Webb; E-Mail to Karleen Murphy on new Case.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/24/20	J.A. Moe, II	0.10	59.93	B190	/Richard Navarro v. St. Francis/ Review extensive Notice on results of the Case Management Conference, served by Verity's Superior Court Counsel.
07/24/20	J.A. Moe, II	0.40	239.70	B190	/Leonard Harris v. St. Francis/ Telephone call to James Behrens on settlement of the Litigation and forward BZBM's Analysis Letter (.10); telephone call from James Behrens on settlement and requesting the Motion and Order on authority to pay SIR, then identify and transmit the Motion and Order to Mr. Behrens (.30).
07/24/20	J.A. Moe, II	0.20	119.85	B190	/Diane Nguyen v. St. Francis./ Exchange E-Mails on Diane Nguyen and allegation she has commenced a class action.
07/27/20	K. Murphy	0.20	83.30	B190	/Rubio / Analyze email from Kathleen Conway re expected case dismissal (.1); and draft updates to Verity charts (.1).
07/27/20	K. Murphy	0.10	41.65	B190	/ Ancira Mateo / Analyze email from Karen Chapman enclosing status report and analyze report.
07/27/20	K. Murphy	0.20	83.30	B190	/ Garcia / Analyze email from Karen Chapman enclosing defendant's withdrawal of objection to plaintiff's third party notice of deposition of SFMC's Person Most Qualified and analyze pleading (.1); and confer with Elina Tilman re follow up re same (.1).
07/27/20	K. Murphy	0.20	83.30	B190	/ Rubio / Analyze multiple emails between John Moe and Mike Gonzalez re inclusion of withdrawal of Proof of Claims in settlement (.1); and draft email to Mr. Gonzalez re settlement information for Verity Charts.
07/27/20	K. Murphy	0.10	41.65	B190	/ CT Corp- DUONG / Analyze CT Corporation Notice re medical record subpoena and email from Elina Tilman advising of duplicative subpoena.
07/27/20	J.A. Moe, II	0.10	59.93	B190	/Aurelio Garcia v. TomaHawk Builders - St. Francis/ Review Elina Tilman's E-Mail and the accompanying Notice Of Withdrawal of deposition.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	K.M. Howard	0.20	50.15	B190	Reviewed and revised Critical Dates Memorandum regarding the hearing on compromise agreement with NantWorks LLC.
07/28/20	J.A. Moe, II	0.40	239.70	B190	/Leonard Harris v. St. Francis/ Telephone call with Elina Tilman, on settlement of Leonard Harris Case (.10); then prepare detailed Memorandum to An Ruda and Elina Tilman on proceeding with settlement (.30).
07/29/20	K. Murphy	0.10	41.65	B190	/ Braun / Analyze email from John Moe enclosing Notice of Entry of Order re co-defendant's Motion for Summary Judgment and respond to the same.
07/29/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze email from Karen Chapman with case update and analyze case update; and response to the same.
07/29/20	J.A. Moe, II	0.10	59.93	B190	/Brian Braun v. St. Francis/ Preliminarily review Judge's opinion granting summary judgment in favor of Dr. Gary Flannery; exchange E-Mails with Karleen Murphy on summary judgment and affect on St. Francis.
07/29/20	K. Murphy	0.10	41.65	B190	/ Basulto / Analyze and respond to email from Karen Chapman with case update and analyze update from litigation counsel.
07/30/20	K. Murphy	0.80	333.20	B190	/ Sprownson / Prepare for attending Status Conference re Bankruptcy by analyzing statement (.1); attend conference (.6); and prepare report and update Verity Deadline Chart re same (.1).
07/30/20	K. Murphy	0.20	83.30	B190	/Nguyen, Natalie / Confer with John Moe and Elina Tilman re upcoming Non-Appearance Case Review re content of statement for matter.
07/30/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze further email from Karen Chapman with further case update.
07/30/20	K. Murphy	0.10	41.65	B190	/ Durham / Telephone call to John Moe re attending upcoming status conference.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	J.A. Moe, II	0.10	59.93	B190	/Josephina Robles v. St. Francis/ Review Notice on upcoming Case Management Conference, and E-Mail to Karleen Murphy on settlement and appearance.
07/30/20	J.A. Moe, II	0.10	59.93	B190	/Breta Durham v. St. Francis/ Preparation for attendance at hearing on August 5th.
07/31/20	K. Murphy	0.30	124.95	B190	/ Robles / Further confer with litigation defense counsel, Gillian Pluma re terms of settlement (.1); and prepare updates to Verity Litigation Management Charts re the same (.2).
07/31/20	K. Murphy	0.70	291.55	B190	/Aaron Raj / Analyze DSLE Claim and John Moe letter to DSLE seeking dismissal (.1); analyze multiple emails from John Moe and Elina Tilman re case facts, including information on notice of bar dates and commencement of bankruptcy action (.2); confer with John Moe re status of response from DLSE and draft email to Elina Tilman re same (.1); and prepare updates to all Verity Charts with new claim and case facts (.3).
07/31/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze further email from Karen Chapman with further case update.
07/31/20	K. Murphy	0.20	83.30	B190	/ Morataya / Analyze and respond to email from John Moe re Plaintiffs' 4th amended Complaint (.1); and draft email to Mike Gonzalas re the same (.1).
07/31/20	K. Murphy	0.20	83.30	B190	/ Robles / Confer with John Moe re settlement (.1); and draft email to Janee Tomlinson to inquire re whether case settled and analyze response to the same (.1).
07/31/20	J.A. Moe, II	0.10	59.93	B190	/Aaron Raj v. St. Francis/ Telephone call to Karleen Murphy on Aaron Raj and response to letter sent to hearing officer.
<b>Subtotal</b>		<b>43.70</b>	<b>21,428.91</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B250 - Real Estate**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	M.M. Welch	0.20	53.55	B250	Read email from Tania Moyron: regarding the Prime/St. Francis Medical Center (.10). Respond to email communication from Tania Moyron (.10).
07/20/20	M.M. Welch	2.10	562.28	B250	Edited doc Copy of Verity et al Schedule D - 11-15-2019 (002 (.50); worked on identifying UCC1' s Financing Statements that need to be terminated (1.60).
07/28/20	M.M. Welch	0.40	107.10	B250	Respond to email from Jon Emerson of Berkeley Research Group, LLC regarding the FMC:Prime Closing (.10); e-mail communication with George Medina regarding UCC searches (.30); Checklist Call
<b>Subtotal</b>		<b>2.70</b>	<b>722.93</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	J.A. Moe, II	0.10	59.93	B300	/Administrative Claims - DaVita/ Telephone call from counsel for DaVita, reviewing fact that payments may not be current and the filing of an Administrative Claim.
07/17/20	K. Murphy	0.10	41.65	B300	/ Morataya / Prepare email to John Moe with relevant case documents to forward to Mike Gonzalez, litigation counsel.
07/20/20	J.A. Moe, II	0.30	179.78	B300	In regard to the resolution of Administrative Claims in connection with the Plan, telephone call from Jon Emerson on Claims of Catherine Wolferd and CNA (.10); exchange E-Mails with and retrieve and transmit to Tania Moyron the Lists of Administrative Claims (.20).
07/21/20	K. Murphy	0.30	124.95	B300	/ Morataya / Telephone calls with John Moe and Mike Gonzalez re information on case valuation.
07/21/20	J.A. Moe, II	1.30	779.03	B300	/Jessica Moritaya v. St. Francis and Conifer v. St. Francis/ Review Conifer's Administrative Claim (.10); confer with Karleen Murphy on basis for Jessica Moritaya's Claim, necessity to review Complaint and conferring with Karen Chapman on assigning counsel, then revising the proposed Case Management Conference Statement (.20); telephone call with Karleen Murphy on basis for claim, then telephone call with Karen Chapman and Karleen Murphy on background to and necessity to confer with Counsel on assessment (.40); E-Mail to Michael Gonzalez transmitting Complaint and Administrative Claim, then telephone call with Karleen Murphy and Mr. Gonzalez on litigation (.60).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	J.A. Moe, II	0.60	359.55	B300	In regard to the reduction of Administrative Claims in connection with the Plan, review Withdrawal Of Claim of Roseann Gonzalez as to St, Francis (.20); review Administrative Claim filed by Catherine Wolferd as to St. Francis, search for Withdrawal, and return call from Elina Tilman on resolution, then review executed Withdrawal and determine if filed, then review Docket, then transmit Withdrawal to Marvin Krakow on permission to file the Withdrawal, obtaining authority, then exchanging E-Mails with Bob Richards on authority, then review of issue on Proof Of Claim (.40).
07/21/20	K. Murphy	0.20	83.30	B300	/ Morataya / Analyze complaint and amended complaint to determine date of incident in medical malpractice matter and identification of entity, Conifer Value Based Care (.1); and draft email to Karen Chapman re conference call to discuss case status (.1).
07/22/20	K. Murphy	0.10	41.65	B300	/ Morataya / Analyze email from Mike Gonzalez with analysis of potential case liability.
07/22/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, exchange E-Mails on and approve filing of Withdrawal Of Claim for Catherine Wolferd.
07/23/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, confirm the Withdrawal Of Claim that has been completed and filed in regard to Catherine Wolferd.
07/27/20	T. Moyron	0.30	179.78	B300	Correspond with H. Kevane, et al. re AppleCare (.2); prepare email to P. Ricotta, et al. re risk pool agreements (.1).
07/29/20	S. Alberts	0.20	160.00	B300	Receive and review UNAC Admin claim and provide initial view.
07/30/20	K.M. Howard	0.40	100.30	B300	Analysis of Stipulation between Debtors and Master Trustee Extending time to file Administrative Expense Claims and reviewed and revised Critical Dates Memorandum.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
	<b>Subtotal</b>	<b>4.10</b>	<b>2,229.78</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	K.M. Howard	0.50	125.38	B310	Analysis of Notice of Bar Date for Filing Administrative Expense Claims and reviewed and revised Critical Dates Memorandum and cross-referenced order to previously issued tentative ruling.
07/15/20	J.A. Moe, II	1.20	719.10	B310	In regard to the reduction of large general unsecured claims, review documents related to relief from stay and highlight Chart on Claims (.20); revise draft of Withdrawal Of Claim for Irene Rodriguez (.20); revise draft of Withdrawal of Claims for Ivonne Engelman (.20); revise the Withdrawal of Claims for Rosa Carcamo (.30); prepare initial draft of Withdrawal Of Claim for Aida Iniquez and Francisco Iniquez (.30);
07/16/20	J.A. Moe, II	0.60	359.55	B310	In regard to the reduction of large general unsecured claims, review and correct the Withdrawal of Claims filed by Ivonne Engelman, and research Engelman Claims as filed with the Court (.20); review the Withdrawal Claim prepared for Iniquez, and E-Mail to Andres Estrada on Claims (.20); review Withdrawal Of Claims of Rosa Carcamo, and ascertain KCC Claim Number (.10); review draft of Withdrawal Of Claim for Irene Rodriguez and necessity to ascertain Court's Claim Number (.10).
07/17/20	J.A. Moe, II	0.30	179.78	B310	In regard to the reduction of large general unsecured claims, review the current drafts of the Stipulations on elimination of Claims for Ivonne Engelman, Rosa Carcamo, Aida & Francisco Iniquez and Irene Rodriguez (as to St. Francis), and Ok Ran MA (as to St. Vincent).
07/17/20	J.A. Moe, II	0.20	119.85	B310	In regard to the elimination of Claims, review the Motion For Relief From Stay filed as to St. Francis by Mesha Sanford.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	J.A. Moe, II	0.40	239.70	B310	In regard to the reduction of large general unsecured claims, exchange internal E-Mails and telephone calls on policy on identifying Claims being withdrawn (.20); telephone call to and with Andres Estrada and to and with Jon Emerson on withdrawals (.10); retrieve previously filed Withdrawals and proposed new Withdrawals (.10).
07/21/20	J.A. Moe, II	0.40	239.70	B310	In regard to reduction of large general unsecured claims, review Luzann Fernandez' E-Mails on accepting service on behalf of individual defendant in the Mesha Sanford Case, and E-Mail on Stipulation to withdraw Claim (.20); telephone call from Kerry Duffy on approach to Attorney Paul Glaser on Mesha Sanford Claim (.10); exchange E-Mails with Paul Glaser on Withdrawal of Claim (10).
07/21/20	J.A. Moe, II	0.30	179.78	B310	In regard to the amount of Administrative Claims in connection with the Plan, revise Withdrawal Of Claim filed by Irene Rodriquez (.20); review and make two additional revisions (.10).
07/21/20	J.A. Moe, II	0.40	239.70	B310	In regard to the reduction of the large general unsecured claims, continue to review Claims (and documents related to Claims) already withdrawn and to be withdrawn as to St. Francis (.30); revise Withdrawal Of Claim of Rosa Carcamo filed against St. Francis (.10).
07/21/20	J.A. Moe, II	0.40	239.70	B310	In regard to the reduction of large general unsecured claims, revise the Withdrawal of the Claim of Rosa Carcamo (.20); revise the Withdrawal of the Claims of Ivonne Engelman (.20).
07/21/20	K. Murphy	0.10	41.65	B310	/ Harris / Prepare revision to Plan Chart for SIR reduction following case settlement and draft email to John Moe re the same.
07/22/20	J.A. Moe, II	0.10	59.93	B310	In regard to the reduction of general unsecured claims, E-Mail to Andres Estrada on identifying the Claims filed by Aida & Francisco Iniquez and Ok Ran Ma.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	J.A. Moe, II	0.20	119.85	B310	In regard to the reduction of large general unsecured claims, review status of the Withdrawals Of Claims, and E-Mail on completion of the two Withdrawals.
07/22/20	J.A. Moe, II	0.10	59.93	B310	In regard to the review of Administrative Claims in connection with the Plan, review the latest version of the Withdrawal of Irene Rodriguez' Claim, making one revision to the Withdrawal.
07/23/20	J.A. Moe, II	0.20	119.85	B310	In regard to review of Administrative Claims in connection with the Plan: review proposed Withdrawal of Claim of Irene Rodriguez, and research and identify Withdrawal filed.
07/23/20	J.A. Moe, II	0.20	119.85	B310	In regard to the reduction of large general unsecured claims, exchange E-Mails with Andy Epstein forwarding to Mr. Epstein a Withdrawal of Rosa Carcamo's Claim, and E-Mail to and telephone call from Elina Tilman on pending payment on settlement.
07/23/20	J.A. Moe, II	0.20	119.85	B310	In regard to the reduction of large general unsecured claims, review and transmit Withdrawal of Engelman Claim to Andy Epstein (.10); exchange E-Mails with Andy Epstein on Withdrawal of the Engelman Claim, and transmit for filing (.10).
07/24/20	J.A. Moe, II	0.30	179.78	B310	In regard to the reduction of large general unsecured claims, review and confirm withdrawal of Ivonne Engelman's three Claims (.10); exchange E-Mails with Andy Epstein on withdrawal of Rosa Carcamo's Claim, obtain executed Withdrawal, and transmittal for filing, with question on identification of the Claim against St. Francis (.20).
07/27/20	J.A. Moe, II	0.40	239.70	B310	/Alicia Rubio v. St. Francis/ Review series of E-Mails on resolution of litigation, and telephone call to Michael Gonzalez on Withdrawal of Claims (.20); telephone call to and E-Mails exchanged with Andres Estrada on claim identification for Withdrawal (.20);

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	J.A. Moe, II	0.90	539.33	B310	In regard to the reduction of large general unsecured claims: Review Motion For Relief From Stay filed by Aida Iniquez as to St. Francis, the Debtors' Response and entered Order, then revise -- through three iterations -- the Withdrawal Of Claim for Aida Iniquez, preparing E-Mail to Marian Danielyan on executing Withdrawal (.70); review Motion For Relief From Stay filed by Maria Zavala against St. Francis, and Order, and determination on Withdrawal Of Claim (.20).
07/31/20	J.A. Moe, II	0.20	119.85	B310	/Josephina Robles v. St. Francis/ Exchange E-Mails with Janee Tomlinson and telephone call with Gillian Pluma on settlement and resolution of Claims (.10); exchange E-Mails with Andres Estrada on Claim Numbers for Josephina Robles (.10).
07/31/20	J.A. Moe, II	0.10	59.93	B310	In regard to the reduction of large general unsecured Claims, exchange E-Mails with Angie Oremus on completing Withdrawal of the Claim filed by Ok Ran Ma.
<b>Subtotal</b>		<b>7.70</b>	<b>4,421.74</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	S. McCandless	0.70	559.30	EMP	Review SFRNA confidential information (.40); communicate with labor and bankruptcy teams regarding same (.30).
07/01/20	C. Doherty, Jr.	10.20	3,814.80	EMP	Prepare Reply and Discovery Stipulation for 1113 Motion, including drafting and preparing Reply document (5.4); prepare comments to discovery stipulations (1.5); gather and check Exhibits for Reply (1.5); telephone calls with Ms. Moyron and Mr. Koffroth regarding Reply (.8); prepare and review emails connected to filing (1.0).
07/01/20	N. Koffroth	9.80	4,914.70	EMP	Draft reply in support of 1113 motion (7.4); draft Ruda declaration (0.8); draft Alberts declaration (0.7); draft Chadwick declaration (0.9)
07/01/20	I. Hsu	0.50	223.13	EMP	Draft and edit declaration supporting 1113 Reply.
07/01/20	I. Hsu	5.20	2,320.50	EMP	Draft and revise declaration for S. Alberts in support of 1113 reply (4.3); phone calls and correspondence re 1113 filing (.6); assist with 1113 filing (.3).
07/01/20	T. Moyron	5.80	3,475.65	EMP	Conference call C. Doherty re filings (.3); analyze and finalize A. Ruda declaration (1.1); analyze emails from BZBM re A. Ruda declaration and prepare emails re same (.3); analyze comments (.3); analyze Reply (.6); analyze P. Chadwick dec (.2); analyze and prepare emails to J. Schlant, et al (.2); analyze emails from UNAC re stipulation (.2); analyze emails from SEIU and Prime re stipulation (.2); analyze follow up emails (.2); analyze UNAC stipulation (.4); analyze SEIU stipulation (.4); analyze and prepare S. Alberts declaration (.6); call with A. Ruda re exhibits (.1); call with R. Adcock re same (.1); exchange emails with BZBM, et al. re exhibits and confidential/sensitive information (.2); analyze emails regarding confidential/sensitive information (.4).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	T. Moyron	2.90	1,737.83	EMP	Analyze, prepare and finalize reply (1.2); finalize SEIU stipulation (.3); finalize UNAC stipulation (.3); final analysis of declarations and exhibits (1.1).
07/01/20	C. Montgomery	0.10	80.00	EMP	Communications with T Moyron regarding section 1113 reply.
07/01/20	S. Alberts	12.20	9,760.00	EMP	Verity SFMC 1113. Obtain client approval to letter in response to UNAC letter of 6/29 and made final changes (.3) and send to UNAC (.1); review and comment on Alberts' Declaration (.5), communicate about Chadwick Declaration (.2), communicate with BRG about severance calculations (.2), review and comment on Ruda Declaration (.2), receive from SEIU Rule 7026 Stipulation and review (.3), engage in communication with SEIU about timing of SEIU's production (.3) and co-counsel and BRG on items for response to SEIU (.2) and client (.2) review email history to SEIU and sent to co-counsel for briefing and for response to Stipulation(.2), draft responses to SEIU's stipulation assertions and circulate (3.1), receive and incorporate comments from professionals on SEIU Stipulation (.3), send SEIU Stipulation to client for approval (.1) receive client approval of SEIU Stipulation and send to Prime (.1), receive Prime view and send to SEIU (.1) and follow up with SEIU, including clarification of timing point and finalize (.3), receive and review UNAC comments to Stipulation, removed uncontested matters and draft responses (2.4), send to client for approval (.1) obtain approval and send to Prime and UNAC (.1), follow up with Prime (.2), conference with co-counsel whether to permit Prime to participate in Stipulation or separate filing and other reply issues (.2), follow up review of Reply and otherwise assist on filing issues, including emails and calls (2.5).
07/02/20	T. Moyron	0.70	419.48	EMP	Conference call with R. Adcock and P. Chadwick re labor matter, Prime requests, etc.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	C. Doherty, Jr.	0.20	74.80	EMP	Review updated filing by Prime regarding 1113 information.
07/02/20	S. Alberts	1.10	880.00	EMP	SFMC 1113. Communicate with A. Ruda concerning state of settlement agreements (.4), conference with P. Smith to create binder of hearing materials (.2), receive Prime filing on stipulation and review (.3) and follow up with co-counsel (.2).
07/03/20	C. Doherty, Jr.	2.00	748.00	EMP	Attend telephone call with UNAC regarding 1113 information (.7); prepare updated declaration regarding 1113 Motion (1.0); provide comments to 1113 Notice regarding UNAC information (.3).
07/03/20	A. Shiran	0.30	154.35	EMP	Attend client call to discuss handling of employee data and hire information.
07/03/20	S. McCandless	1.90	1,518.10	EMP	Review communication from L. Fernandez regarding Prime human resources data information request and related background memorandum (.60); communicate with T. Moyron regarding same (.20); conference call with R. Adcock, H. Levy-Biehl, and bankruptcy and labor team to discuss Prime request (.30); provide detailed comments on L. Fernandez' proposed communication to Prime for revisions to same (.60); review email as sent to Prime (.10); review email from R. Adcock following same and as to follow up call with Prime (.10).
07/06/20	C. Doherty, Jr.	0.70	261.80	EMP	Review Replies filed by Unions in preparation for hearing
07/06/20	K.M. Howard	0.20	50.15	EMP	Email exchange with An Ruda regarding the 1113 hearings (.1); email exchange with A. Ruda's assistant regarding the hearing on the 1113 motions (.1).
07/06/20	S. Alberts	0.30	240.00	EMP	SFMC. Communicate with UNAC about PTO and follow up to satisfy updated request.
07/07/20	T. Moyron	0.70	419.48	EMP	Analyze J. Schlant, et al., emails re UNAC (.2); analyze tentative ruling granting 1113 motions (.3); correspondence regarding same (.2).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	K.M. Howard	0.80	200.60	EMP	Reviewed docket and assembled relevant pleadings pertaining to Debtors' 1113 Motions regarding SEIU and UNAC (.4); analysis of the court's tentative ruling granting Debtors' 1113 motion pertaining to the SEIU and UNAC and reviewed and revised Critical Dates Memorandum (.4).
07/07/20	A. Shiran	0.10	51.45	EMP	Review letter from Prime Healthcare regarding UNAC impasse.
07/07/20	S. Alberts	6.40	5,120.00	EMP	SFMC 1113. Communicate with J. Schlant about updated PTO amount (.1) and advise UNAC (.1), receive request to upload updated (since last year) UNAC personal amounts, severance info, review and authorize uploading to data room (.2), communicate about UNAC and SEIU replies and send links to client (.1), conference with A. Ruda about UNAC threats of NRLA action (.2), prepare for 1113 hearing including reading Replies and other materials (4.4), communicate about status of P. Chadwick supplemental declaration (.2), receive, skim result and forward tentative ruling to client on 1113 motions (.2), read tentative ruling (.6), receive and respond to message from UNAC about form of order (.1) and follow up with BRG about certain representation (.2).
07/07/20	S. McCandless	0.20	159.80	EMP	Review Prime letter to UNAC in context of anticipated sale and employee terminations.
07/07/20	C. Doherty, Jr.	1.10	411.40	EMP	Review Tentative Rulings (.6); review and respond to emails re hearing (.5)
07/08/20	C. Doherty, Jr.	0.70	261.80	EMP	Prepare for and attend section 1113 hearing
07/08/20	S. Alberts	4.50	3,600.00	EMP	SFMC 1113. Communicate with A. Ruda about severance issues (.2), prepare for hearing in view of UNAC's decision to contest tentative ruling (3.0), communicate with co-counsel and client about approach to hearing (.2) hearing on 1113 Motion (.8) and follow up (.3).
07/08/20	T. Moyron	0.90	539.33	EMP	Telephonic appearance on 1113 motions.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/20	S. Maizel	0.90	720.00	EMP	Participate in hearing on 1113 motions.
07/09/20	N. Koffroth	2.40	1,203.60	EMP	Draft orders on motions to reject SEIU and UNAC CBAs
07/09/20	S. Alberts	0.40	320.00	EMP	SFMC. 1113 Work up draft order for 1113 relief and circulate.
07/09/20	S. Maizel	0.10	80.00	EMP	Telephone conference with T. Moyron re 1113 motion issues.
07/11/20	S. Alberts	0.60	480.00	EMP	SFMC 1113. Review and comment on form of order, in doing so, also review revised Tentative Order.
07/13/20	S. Alberts	0.80	640.00	EMP	Communicate with co-counsel about status of form of order (.1), communicate with AHMC with respect to form of order (.1), review further changes to order and comments thereto (.2), send form of order to UNAC (.1) and SEIU (.1), received response to UNAC (.1) and communications in response (.1).
07/14/20	K.M. Howard	0.50	125.38	EMP	Prepared Notice of Lodgment of Order Granting Debtors' 1113 Motion to Reject SEIU CBA (.2); prepared Notice of Lodgment of Order Granting Debtors' 1113 Motion to Reject UNAC CBA (.2); finalized each and prepared email to Verity Team (.1).
07/14/20	K.M. Howard	0.30	75.23	EMP	Prepared Transcript Order Form regarding the hearing transcripts of Debtors' 1113 Motions (.2); filed same (.1).
07/14/20	S. Alberts	1.20	960.00	EMP	Review UNAC communication filed last night and draft a response (.3), follow from and to UNAC via email (.2), communicate with co-counsel of UNAC's statements and resolution thereof (.2), email to J. Kohanski (.1), CW J. Kohanski and working group about form of order (.3), follow up internally and authorize filing of order (.1).
07/14/20	S. Maizel	0.70	560.00	EMP	Telephone conference with BRG, R. Adcock, etc. re labor issues.
07/14/20	N. Koffroth	0.20	100.30	EMP	Participate in call with counsel to UNAC, counsel to Prime, et al. re form of order granting 1113 motion

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/20	K.M. Howard	0.20	50.15	EMP	Email exchanges with K. Persaud regarding the hearing transcripts of Debtors' 1113 motions regarding SEIU and UNAC collective bargaining agreements.
07/15/20	K.M. Howard	0.20	50.15	EMP	Received and reviewed the transcript of the July 8th hearing on Debtors' 1113 motions (.1); prepared emails to Verity Team (.1).
07/16/20	K.M. Howard	0.20	50.15	EMP	Analysis of the orders (x2) regarding Debtors' Motions to Reject CBA with SEIU and UNAC to determine any deadlines set by the court.
07/22/20	N. Koffroth	0.60	300.90	EMP	Participate in call with H. Levy-Biehl, T. Moyron, et al. re employee notices
07/22/20	T. Moyron	0.60	359.55	EMP	Correspond regarding sent employees releases (.3); conference call with A. Ruda (.3).
07/22/20	S. McCandless	2.20	1,757.80	EMP	Review and analyze proposed letter regarding health benefits and related information received from H. Levy-Biehl to be forwarded on her recommendation behalf of Prime (.60); review A. Ruda's and H. Levy-Biehl's comments on same (.20); team call with H. Levy-Biehl, A. Ruda, T. Moyron, and R. Adcock to provide Dentons comments on same and discuss alternative approach (.70); report to and communicate with T. Moyron following same (.40); further discuss same with T. Moyron (.20); further call with T. Moyron following forwarding of information (.10).
07/22/20	A. Shiran	1.70	874.65	EMP	Review employee benefits letters and information and cover email to be set on behalf of Prime (.8); multiple internal correspondence and client correspondence relating to same (.5); review and discuss impact of health information waiver (.4).
07/22/20	S. Alberts	0.30	240.00	EMP	Communication about SEIU's threatened ULP concerning 1113 negotiations with Prime and Debtors.
07/23/20	A. Shiran	0.80	411.60	EMP	Receipt and review of further Prime Letter regarding applications and anticipated close (.4); discuss same with S. McCandless (.4).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	S. McCandless	1.30	1,038.70	EMP	Review and analyze Prime letter to St. Francis Associates in context of Verity employment actions to be taken (.30); discuss implications of same with A. Youssefi (.40); review communications from P. Chadwick, H Levy-Biehl, and T. Moyron as related to same (.30); communicate with T. Moyron regarding wage payments to employees in context of same (.30).
07/24/20	S. McCandless	0.70	559.30	EMP	Review UNAC opposition to Prime health care authorization which was inadvertently sent (.20); review and analyze A. Ruda's proposed response to same (.40); communicate with T. Moyron regarding same (.10).
07/25/20	S. McCandless	0.40	319.60	EMP	Review email from T. Moyron regarding union objection to release of health information (.20); related communications with T. Moyron and A. Ruda (.20).
07/26/20	S. McCandless	3.10	2,476.90	EMP	Draft and provide information to Dentons team regarding legal issues posed by original version of authorization of release of health information (.80); review said version of authorization for same (.20); review and analyze A. Ruda's proposed two communications to UNAC and to employees in response to UNAC's stated concerns (.60); review T. Moyron's edits to same (.20); provide further edits (.40); communicate with A. Ruda regarding same (.20); further communicate with T. Moyron regarding same (.10); review H. Levy-Biehl's response to comments (.10); review T. Moyron's and J. Adcock's further responses (.10); email H. Levy-Biehl and team regarding legal issues being addressed (.20); further communicate with T. Moyron regarding related legal issues (.20).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	S. McCandless	3.20	2,556.80	EMP	Discuss status of health information release and communication to UNAC and employees and further work to be done with A. Youssefi (.40); review new authorization form received from J. Richlin (.20); further discuss same and need for related legal research with A. Youssefi (.30); discuss and revise proposed communication to employees regarding earlier release with A. Youssefi (.80); discuss issues posed by release of health information with S. Groden of Dentons healthcare team (.30); prepare detailed email to R. Fayed and S. Groden posing related questions (.70); various related communications regarding handling of earlier release and drafting and forwarding of union/employee communications with T. Moyron, A. Ruda, and R. Adcock (including related forwarding of responses to UNAC and SEIU) (.50).
07/29/20	S. Maizel	0.50	400.00	EMP	Participate in hearing on 1113 hearing.
07/30/20	S. Alberts	0.10	80.00	EMP	Communication about status of Prime and union CBAs.
07/30/20	R. Fayed	1.20	795.60	EMP	Review and assess questions from S. McCandless regarding employment record health information disclosures (.2); draft and transmit response on same (.8); address follow-up questions from S. McCandless on same (.2).
07/30/20	A. Shiran	1.00	514.50	EMP	Receipt and review of further correspondence from Prime regarding pre hire requirements (.1); evaluate optional release provided relating to pre employment conditions and finalize revisions to same (.8) correspondence regarding same with bankruptcy and labor teams. (.1)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	S. McCandless	1.90	1,518.10	EMP	Review and analyze new Authorization received from J. Richlin and related Richlin comments (.40); communicate with R. Fayed, Dentons HIPAA expert, regarding same, including provision of background information (.30); review and analyze response (.30); pose further legal questions to R. Fayed (.30); review further response (.20); review A. Youssefi's revisions to Authorization (.10); further revise same (.20); various related follow up communications with T. Moyron and labor team (.10).
07/31/20	S. McCandless	1.60	1,278.40	EMP	Review proposed Prime communication to St. Francis employees (.40); communicate with T. Moyron regarding same (.20); revise same (.40); further communicate with T. Moyron regarding same (.10); communicate with A. Ruda regarding same (.10); review H. Levy-Biehl's further changes (.10); communicate with T. Moyron regarding same (.10); review further communications (Richlin and Moyron) related to authorization for release of medical records by Verity to Prime (.20).
<b>Subtotal</b>		<b>100.10</b>	<b>62,893.81</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/19/20	R. Garms	0.70	422.45	INS	Review and respond to questions regarding insurance.
	<b>Subtotal</b>	<b>0.70</b>	<b>422.45</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/04/20	S. Maizel	1.00	800.00	MED/CMS	Review and revise settlement agreements with CMS and forward to E. Levey, etc.
07/07/20	T. Moyron	0.60	359.55	MED/CMS	Conference call with CMS, P. Chadwick, S. Maizel, et al. re Settlement, SVMC, etc. (.2); follow up call thereafter with P. Chadwick, et al. (.2); call with S. Maizel thereafter re CMS (.2).
07/07/20	N. Koffroth	2.10	1,053.15	MED/CMS	Participate in internal call re settlement issues
07/09/20	T. Moyron	0.50	299.63	MED/CMS	Conference call with CMS, P. Chadwick, S. Maizel, et al. (.3); conference call with S. Maizel, H. Levy-Biehl re CMS (.2).
07/15/20	N. Koffroth	0.40	200.60	MED/CMS	Draft stipulation to continue hearing and related deadlines concerning any objection to the transfer of provider agreements
07/15/20	S. Maizel	0.90	720.00	MED/CMS	Telephone conference with CMS regarding settlements (.3); telephone conference with H. Levy Biehl re same (.3); review and respond to emails re same (.3).
07/16/20	S. Maizel	0.40	320.00	MED/CMS	Telephone conference with CMS counsel re settlement (.3); emails with BRG, R. Adcock, etc. re same (.1).
07/17/20	S. Maizel	0.40	320.00	MED/CMS	Telephone conference with CMS counsel re settlement proposal (.3); telephone conference with T. Moyron re same (.1).
07/17/20	S. Maizel	0.20	160.00	MED/CMS	Review and respond to emails re CMS settlement issues.
07/19/20	S. Maizel	2.00	1,600.00	MED/CMS	Revising global settlement with CMS.
07/20/20	S. Maizel	1.20	960.00	MED/CMS	Telephone conference with R. Adcock re CMS settlement issues (.2); telephone conference with BRG, etc. re CMS settlement issues (.8); telephone conference with Hope Levy Biehl re same (.2).
07/20/20	S. Maizel	2.00	1,600.00	MED/CMS	Revising CMS settlement.
07/20/20	S. Maizel	0.50	400.00	MED/CMS	Review and respond to emails re CMS settlement terms.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	T. Moyron	1.20	719.10	MED/CMS	Conference call with R. Adcock, BRG, S. Maizel re CMS settlement (.8); analyze correspondence and settlement (.4).
07/20/20	N. Koffroth	0.80	401.20	MED/CMS	Participate in call with R. Adcock, P. Chadwick, et al. re CMS settlement issues
07/21/20	S. Maizel	2.30	1,840.00	MED/CMS	Telephone conference with counsel for CMS re settlement (.6); telephone conference with Hope Levy Biehl re same (.2); revising settlement agreement (1.5).
07/21/20	T. Moyron	0.40	239.70	MED/CMS	Analyze matters related to CMS settlement (.2); analyze H. Levy-Biehl, et al. (.2).
07/22/20	T. Moyron	0.50	299.63	MED/CMS	Conference call with S. Maizel, et al. regarding GME re CMS (.4); analyze correspondence re same (.1).
07/22/20	S. Maizel	0.30	240.00	MED/CMS	Review and respond to emails from Prime re settlement with CMS (.2); emails to Counsel for CMS re same (.1).
07/22/20	S. Maizel	0.30	240.00	MED/CMS	Email to R. Adcock, etc. re settlement discussion with CMS.
07/23/20	S. Maizel	0.60	480.00	MED/CMS	Telephone conference with CMS counsel re settlement of provider agreement transfers.
07/24/20	T. Moyron	0.30	179.78	MED/CMS	Analyze E. Levey, et al., emails re CMS settlement agreement.
07/24/20	S. Maizel	0.50	400.00	MED/CMS	Review and revise settlement with CMS re provider agreements (.4); review and respond to emails re same with CMS Counsel (.1).
07/25/20	T. Moyron	0.20	119.85	MED/CMS	Analyze H. Levy-Biehl email and attachments (.1) and reply thereto (.1) re CMS agreement.
07/26/20	T. Moyron	0.10	59.93	MED/CMS	Analyze email from F. Sze re overpayments.
07/26/20	T. Moyron	0.70	419.48	MED/CMS	Conference call with H. Levy Biehl and S. Maizel re CMS and DCHS settlements (.4); analyze matters related to CMS settlement and related correspondence (.3).
07/27/20	S. Maizel	0.10	80.00	MED/CMS	Telephone conference with CMS counsel re settlement issues.
07/28/20	K.M. Howard	0.20	50.15	MED/CMS	Reviewed and incorporated QAF related documents.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	S. Maizel	0.10	80.00	MED/CMS	Emails to UCC and secured creditors re CMS settlement.
07/31/20	S. Maizel	0.70	560.00	MED/CMS	Telephone conference with Elan Levey re CMS settlement (x2) (.2); review and respond to emails re same (.5).
<b>Subtotal</b>		<b>21.50</b>	<b>15,201.75</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K.M. Howard	0.40	100.30	MED/DHCS	Analysis of the order approving the stipulation continuing objection deadlines for DHHS and continuing the hearing and reviewed and revised Critical Dates Memorandum.
07/01/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails re pending appeal to DHCS.
07/03/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails from Ken Wang re DHCS settlement.
07/03/20	S. Maizel	0.50	400.00	MED/DHCS	Review DHCS settlement revisions.
07/03/20	T. Moyron	0.20	119.85	MED/DHCS	Analyze email from K. Wang and related settlement matters.
07/04/20	S. Maizel	0.40	320.00	MED/DHCS	Review and respond to emails re DHCS settlement over transfer of provider agreement.
07/06/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails re DHCS settlement re provider agreements.
07/08/20	S. Maizel	0.30	240.00	MED/DHCS	Review and respond to emails from G. Gertler re revisions to DHCS settlement.
07/09/20	S. Maizel	0.50	400.00	MED/DHCS	Review and revise settlement agreement with DHCS.
07/10/20	S. Maizel	0.50	400.00	MED/DHCS	Revising DHCS settlement.
07/12/20	S. Maizel	0.40	320.00	MED/DHCS	Review and respond to emails re DHCS settlement.
07/14/20	S. Maizel	0.10	80.00	MED/DHCS	Telephone conference with P. Chadwick re settlements with DHCS and CMS.
07/14/20	S. Maizel	0.40	320.00	MED/DHCS	Review and respond to emails re settlements with DHCS and CMS.
07/14/20	S. Maizel	0.10	80.00	MED/DHCS	Telephone conference with Joel Richlin re settlements with DHCS and CMS.
07/16/20	K.M. Howard	0.40	100.30	MED/DHCS	Analysis of the Stipulation extending the deadlines and continuing the hearing on the DHCS objections to the transfer of Medi-Cal Provider Agreements and reviewed and revised Critical Dates Memorandum.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	S. Maizel	0.70	560.00	MED/DHCS	Telephone conference with Ken Wang re DHCS settlements (.1); telephone conference with H. Levy Biehl re same (.1); review revisions from K. Wang to settlement (.5).
07/26/20	S. Maizel	1.20	960.00	MED/DHCS	Telephone conference with H. Levy Biehl, etc. DHCS and CMS settlements (.5); review and revise DHCS settlement (.7).
07/27/20	S. Maizel	0.50	400.00	MED/DHCS	Email to Ken Wang re revisions to settlement agreement (.3); email to P. Chadwick re same (.1); emails to Prime re same (.1).
07/27/20	T. Moyron	0.20	119.85	MED/DHCS	Analyze H. Levy-Biehl, et al., correspondence regarding DHCS settlement.
07/28/20	T. Moyron	0.40	239.70	MED/DHCS	Analyze DHCS settlement and related correspondence.
07/29/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails re DHCS settlement.
07/30/20	S. Maizel	0.60	480.00	MED/DHCS	Review and respond to emails re DHCS settlement.
<b>Subtotal</b>		<b>8.50</b>	<b>6,200.00</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2313110

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	41,002.74
B130	Asset Disposition	80,921.94
B140	Relief from Stay/Adequate Protection Proceedings	7,661.12
B185	Assumption/Rejection of Leases and Contracts	2,523.68
B190	Other Contested Matters (excl. assumption/rejection motions)	21,428.91
B250	Real Estate	722.93
B300	Claims and Plan	2,229.78
B310	Claims Administration and Objections	4,421.74
EMP	Employee matters	62,893.81
INS	Insurance	422.45
MED/CMS	Medicare/CMS Issues	15,201.75
MED/DHCS	Medi-Cal/DHCS Issues	6,200.00
Total This Matter		\$245,630.85

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	7.30	\$5,840.00
S. Alberts	\$800.00	31.10	\$24,880.00
S. Maizel	\$800.00	40.80	\$32,640.00
R. Fayed	\$663.00	1.20	\$795.60
R. Garms	\$603.50	38.30	\$23,114.05
R. Richards	\$723.00	1.20	\$867.60
R. Westhoff	\$468.00	14.60	\$6,832.80
S. McCandless	\$799.00	17.20	\$13,742.80
T. Moyron	\$599.25	62.80	\$37,633.05
J.A. Moe, II	\$599.25	39.90	\$23,910.41

St. Francis Medical Center  
Invoice #: 2313110

August 30, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Richter	\$646.00	2.10	\$1,356.60
K. Murphy	\$416.50	24.40	\$10,162.60
R. Millner	\$800.00	0.20	\$160.00
M. Zeefe	\$480.25	0.30	\$144.08
A. Shiran	\$514.50	3.90	\$2,006.55
C. Doherty, Jr.	\$374.00	14.90	\$5,572.60
N. Koffroth	\$501.50	75.50	\$37,863.25
C. Bacon-Schulte	\$484.50	7.10	\$3,439.95
I. Hsu	\$446.25	5.70	\$2,543.63
A. Dondoyano	\$323.00	27.20	\$8,785.60
G. Medina	\$293.25	0.80	\$234.60
K.M. Howard	\$250.75	9.50	\$2,382.15
M.M. Welch	\$267.75	<u>2.70</u>	<u>\$722.93</u>
Totals		428.70	\$245,630.85

Fee Total \$ 245,630.85

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Invoice Total \$ 245,630.85

DENTONS

Main Document

SNR Denton US LLP  
Page 915 of 1313Suite 2500  
Los Angeles, California 90017-5704Alston Hunt Floyd & Ing is now  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313111**Matter: 15800425-000007  
St. Louise Regional Hospital

Payment Due Upon Receipt

Total This Invoice

\$ 41.65

Please return this page with your payment

In the case of mail deliveries to:

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8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
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233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313111**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000007  
St. Louise Regional Hospital

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	K. Murphy	0.10	41.65	B190	/ Steele / Analyze email from Karen Chapman with case update and analyze enclosed update.
	<b>Subtotal</b>	<b>0.10</b>	<b>41.65</b>		



St. Louise Regional Hospital  
Matter: 15800425-000007  
Invoice No.: 2313111

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B190	Other Contested Matters (excl. assumption/rejection motions)	41.65
	Total This Matter	\$41.65

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
K. Murphy	\$416.50	<u>0.10</u>	<u>\$41.65</u>
Totals		0.10	\$41.65
Fee Total	\$	41.65	
Invoice Total	\$	<u>41.65</u>	

DENTONS

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SNR Denton US LLP  
Page 912 of 1313Suite 2500  
Los Angeles, California 90017-5704Alston Hunt Floyd & Ing is now  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313112**

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

Payment Due Upon Receipt

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Total This Invoice	\$ 169,160.82
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SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

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at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313112**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/20	S. Maizel	0.30	240.00	AGI	Telephone conference with R. Adcock re AG public meeting.
07/06/20	T. Moyron	2.20	1,318.35	AGI	Attend virtual AG public meeting.
07/06/20	A. Shiran	2.80	1,440.60	AGI	Attend Seton AG hearing.
07/06/20	S. Maizel	2.80	2,240.00	AGI	Prepare for AG public meeting re sale (.3); attend virtual public meeting re sale (2.5).
07/06/20	S. Maizel	0.20	160.00	AGI	Telephone conference with T. Moyron re AG public meeting issues.
07/06/20	S. McCandless	2.70	2,157.30	AGI	Attend Seton AG hearing for overall background knowledge as to various pending matters, including upcoming Mediation and employment matters related to sale of Seton.
07/06/20	T. Moyron	0.20	119.85	AGI	Analyze emails from R. Adcock, et al. re San Mateo County meeting.
07/27/20	T. Moyron	0.30	179.78	AGI	Analyze AG conditional approval (.2); prepare email to Milbank and Mintz (.1).
07/29/20	T. Moyron	0.10	59.93	AGI	Conference call with R. Adcock re AHCM re AG conditions.
07/29/20	N. Koffroth	7.70	3,861.55	AGI	Draft motion to sell free and clear of attorney general conditions
<b>Subtotal</b>		<b>19.30</b>	<b>11,777.36</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/20	C. Montgomery	0.20	160.00	B130	Communications with T Moyron and S Warren regarding state agreement termination.
07/02/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re United and Cigna issues with notification (.1); telephone conference with R. Adcock re same (.1).
07/02/20	S. Maizel	0.20	160.00	B130	Review and respond to emails re United and Cigna notice re intent of contract.
07/02/20	T. Moyron	0.70	419.48	B130	Analyze email from E. Goldstein (.1); prepare emails to AHMC, et al., re same (.3); conference calls with R. Adcock (.1), (.2).
07/02/20	J.A. Moe, II	0.10	59.93	B130	Exchange E-Mails with Dan Besikoff on projected date on which sale to AHMC might close; transmit recently filed Notice on assumption and assignment of execute contracts and unexpired leases to Mr. Besikoff.
07/03/20	T. Moyron	0.70	419.48	B130	Call with E. Goldstein, AHMC, etc. re designation re order (.3); conference call with S. Jerome regarding same, Cigna and plan (.2); analyze E. Goldstein email (.1); analyze follow up email E. Golstein (.1).
07/03/20	S. Maizel	0.20	160.00	B130	Telephone conference with AHMC counsel, UnitedHealthcare counsel, etc. re contract issues.
07/04/20	C. Montgomery	0.10	80.00	B130	Communications with T Moyron and S Warren regarding cancellation of termination notice.
07/06/20	T. Moyron	0.60	359.55	B130	Conference call with R. Adcock, A. Ruda, et al. re San Mateo County Paid Sick Leave Ordinance on Tuesday's BOS agenda.
07/06/20	S. Maizel	0.20	160.00	B130	Telephone conference re Cigna contract issues.
07/06/20	S. Maizel	0.60	480.00	B130	Telephone conference with R. Adcock, etc. re San Mateo Board of Supervisors sick leave resolutions (.5); review and respond to emails re same (.1).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	T. Moyron	0.40	239.70	B130	Analyze A. Ruda, R. Adcock, et al. correspondence re labor matters.
07/07/20	T. Moyron	0.10	59.93	B130	Analyze P. Chadwick correspondence and reply to same re Chicago Title.
07/10/20	A. Dondoyano	0.10	32.30	B130	Review emails from BRG and title company re transaction closing.
07/10/20	C. Montgomery	0.20	160.00	B130	Phone call with D Riley regarding execution of PACE financing settlement.
07/13/20	A. Dondoyano	0.50	161.50	B130	Review emails from BRG and title company re transaction closing.
07/13/20	C. Montgomery	0.10	80.00	B130	Communications with A Dondoyano and P Chadwick regarding closing checklist.
07/13/20	R. Westhoff	0.20	93.60	B130	Review draft closing checklist re: real estate items for closing (.1); review email from P. Chadwick re: same (.1).
07/14/20	A. Dondoyano	3.40	1,098.20	B130	Review file re APA and TSA and email to M.Garms re same (0.2); draft various closing documents and certificates and revise closing checklist (1.8); draft Indemnity Escrow Agreement (1.4)
07/14/20	R. Westhoff	0.50	234.00	B130	Review closing status (.1); review Asset Purchase Agreement re: real estate provisions (.2); review title commitments and emails re: title requirements from L. Kmiec (.2).
07/14/20	R. Garms	1.40	844.90	B130	Call with Seton in-house counsel regarding transaction closing (0.5); e-mails regarding transaction closing documents (0.9).
07/15/20	R. Garms	2.50	1,508.75	B130	Review and comment on escrow agreement (0.9); e-mails regarding transaction completion requirements (0.5); review Transition Services Agreement exhibit information (0.4); follow up on real estate documentation (0.7).
07/15/20	R. Westhoff	0.90	421.20	B130	Continue review of Asset Purchase Agreement re: real estate items (.3); review and analyze title commitments and requirements (.4); review strategy for handling same (.2).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/20	A. Dondoyano	1.00	323.00	B130	Draft Indemnity Escrow Agreement (0.6); Revise closing checklist and email to closing checklist call group re same (0.4).
07/16/20	A. Dondoyano	0.70	226.10	B130	Revise closing checklist and attend to closing checklist matters (0.2); review email from R.Westhoff re Seton real estate questions and emails to client re same (0.5).
07/16/20	R. Westhoff	2.60	1,216.80	B130	Continue review and analysis of title requirements for Moss Beach and Daly City facilities (.8); review strategy for resolving same (.3); review issue re: building code violation at Moss Beach location (.4); coordinate handling re: same (.1); review status of surveys and zoning reports (.2); review title commitments re: outstanding liens to be discharged at closing (.5); begin preparation of spreadsheet summarizing same (.3).
07/16/20	R. Garms	0.90	543.15	B130	Work on Transition Services Agreement.
07/17/20	R. Garms	1.50	905.25	B130	Closing checklist call and follow up regarding same (0.7); review real estate documents for delivery (0.8).
07/17/20	R. Westhoff	0.90	421.20	B130	Review surveys and additional diligence documents uploaded to data room (.3); continue preparation of spreadsheet summarizing outstanding liens from title commitment to be discharged at closing (.6).
07/17/20	T. Moyron	1.50	898.88	B130	Conference call with AHMC, et al. re closing checklist (.8); analyze email from AHMC re assignment and reply to same (.1); analyze H. Levy-Biehl email re ATT and respond to same (.1); analyze scheduling orders (.2); analyze final motion to reject re Local 39 (.3).
07/17/20	S. Maizel	0.90	720.00	B130	Telephone conference with AHMC re closing checklist issues.
07/17/20	N. Koffroth	0.80	401.20	B130	Participate in closing checklist call with counsel to AHMC

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	A. Dondoyano	0.40	129.20	B130	Revise closing checklist and attend to closing checklist matters (0.2); review email from R.Westhoff re Seton real estate questions and email to client re same (.2).
07/17/20	A. Dondoyano	1.80	581.40	B130	Review surveys and zoning reports and email to R.Westhoff re same (0.5); Closing Checklist call and revise Closing Checklist (1.1); confer with client and DWT re Seton employees (0.2).
07/20/20	A. Dondoyano	0.10	32.30	B130	Review emails from title company re surveys.
07/20/20	R. Garms	1.30	784.55	B130	Work on open real estate matters (0.4); review exhibits for Transition Services Agreement (0.9).
07/21/20	R. Garms	1.40	844.90	B130	Work on Transition Services Agreement.
07/21/20	A. Dondoyano	1.50	484.50	B130	Review AHMC revisions to closing checklist and revise the same.
07/21/20	R. Westhoff	0.20	93.60	B130	Continue preparation of spreadsheet summarizing outstanding liens from title commitment to be discharged at closing.
07/22/20	A. Dondoyano	2.80	904.40	B130	Internal checklist call (0.9); Closing Checklist call and revise closing checklist (0.6); revise TSA (0.3); revise Indemnity Escrow Agreement (0.8); draft various closing documents (0.2).
07/22/20	C. Montgomery	1.30	1,040.00	B130	Review and comment upon TSA and schedules.
07/22/20	S. Maizel	0.40	320.00	B130	Telephone conference with AHMC re checklist of closing issues.
07/22/20	N. Koffroth	0.40	200.60	B130	Participate in closing checklist call with counsel to AHMC
07/22/20	R. Garms	3.80	2,293.30	B130	Work on closing documents (0.8); calls regarding open closing items (0.7); work on Transition Services Agreement (2.3).
07/23/20	R. Garms	0.90	543.15	B130	Review real estate documents and questions.
07/23/20	A. Dondoyano	0.30	96.90	B130	Revise and circulate closing checklist.

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	C. Montgomery	0.30	240.00	B130	Communications with D Riley re closing timing(.1); communications with P Chadwick, T Moyron re same (.1); phone call with D Riley re same (.1)
07/24/20	S. Maizel	0.30	240.00	B130	Telephone conference with AHMC, R. Adcock, BRG, etc. re sale closing checklist issues.
07/24/20	S. Maizel	0.50	400.00	B130	Telephone conference with R. Adcock, BRG, etc. re sale closing issues.
07/24/20	A. Dondoyano	4.30	1,388.90	B130	Draft various closing documents and circulate the same along with Schedule 2.21 (3.0); Closing Checklist call and update closing checklist (0.6); internal closing checklist call (0.7).
07/24/20	T. Moyron	0.30	179.78	B130	Conference call with AHMC, et al. re closing checklist.
07/24/20	N. Koffroth	0.40	200.60	B130	Participate in closing checklist call with counsel to AHMC
07/24/20	T. Moyron	0.30	179.78	B130	Analyze emails from P. Chadwick re TSA (.1); call with M. Garms re same (.2).
07/24/20	R. Garms	2.80	1,689.80	B130	Work on Transition Services Agreement (1.6); call and follow up regarding closing items (0.4); review and revise closing documents (0.8).
07/25/20	R. Garms	3.90	2,353.65	B130	Call regarding Transition Services Agreement (0.5); review and revise same (3.4).
07/25/20	T. Moyron	0.60	359.55	B130	Analyze TSA questions and correspondence (.2); conference call with P. Chadwick, et al., re TSA (.4).
07/25/20	C. Montgomery	0.50	400.00	B130	Phone call T Moyron regarding AHMC assignment issue (.1); communications with M Garms re same (.1); participate in phone conference with T Moyron, S Maizel, M Garms, H Levy-Beihl, D Galfus, P Chadwick regarding AHMC TSA and MPL issues (.3)
07/26/20	C. Montgomery	0.30	240.00	B130	Review revised TSA and communications with T Moyron re same.
07/26/20	T. Moyron	0.10	59.93	B130	Analyze correspondence re TSA redline.



Seton Medical Center and Seton Coastsides  
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August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/20	R. Garms	1.20	724.20	B130	Work on Transition Services Agreement (0.9); e-mails regarding transaction (0.3).
07/27/20	R. Garms	3.10	1,870.85	B130	Review and revise closing documents (1.6); work on Transition Services Agreement (1.5).
07/27/20	R. Westhoff	0.90	421.20	B130	Review Quitclaim Deeds for real property transfer (.2); review issues re: same (.1); review email from L. Kmiec re: outstanding closing items (.1); internal call re: same (.2); review strategy for resolving outstanding title issues (.3).
07/27/20	A. Dondoyano	3.00	969.00	B130	Draft various closing documents (2.5); internal closing checklist call (0.5).
07/27/20	T. Moyron	0.20	119.85	B130	Analyze J. Schlant, Chicago Title, et al. emails re closing.
07/27/20	K.M. Howard	0.30	75.23	B130	Reviewed and revised Critical Dates Memorandum concerning current deadline to close the sale.
07/27/20	T. Moyron	0.30	179.78	B130	Call with H. Levy-Biehl, et al. re ATT.
07/28/20	A. Dondoyano	0.80	258.40	B130	Draft various closing documents and email the same to AHMC (0.3); revise closing checklist and email same to closing checklist call group (0.5).
07/28/20	R. Westhoff	2.80	1,310.40	B130	Continue review of outstanding punch list items for closing (.3); follow up and coordinate resolution of same (.6); review email from J. Schlant confirming delivery of surveys and creditor matrix to title company (.1); telephone calls to/from L. Kmiec re: PACE assessments (.3); review email from L. Kmiec re: same (.1); review and analyze issues re: same (.3); continue preparation of spreadsheet summarizing outstanding liens (.9); finalize same (.1); distribute same for review (.1).
07/28/20	R. Garms	2.20	1,327.70	B130	E-mails regarding open transaction matters (0.6); review and discuss lien issues (0.3); review revised closing documents (1.3).
07/28/20	C. Montgomery	0.40	320.00	B130	Communications with T Moyron, P Chadwick regarding AHMC sale issues.

Seton Medical Center and Seton Coastsides  
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August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	R. Garms	2.10	1,267.35	B130	Follow up on open closing items and call regarding same (0.8); work on closing documents (0.5); review questions regarding schedules (0.8).
07/29/20	A. Dondoyano	2.70	872.10	B130	Closing Checklist call and revise closing checklist (0.6); facilitate and deliver items requested by the title company (1.7); internal checklist call (0.4).
07/29/20	N. Koffroth	0.40	200.60	B130	Participate in call with counsel to AHMC re closing issues
07/29/20	R. Westhoff	0.40	187.20	B130	Review issues re: title company's request for surveys (.2); review survey for 1800 & Sullivan Ave (.2).
07/29/20	S. Maizel	0.40	320.00	B130	Telephone conference with AHMC re closing checklist.
07/30/20	T. Moyron	0.30	179.78	B130	Call with R. Adcock re AG (.1); analyze closing checklist and related matters (.2).
07/30/20	R. Westhoff	0.90	421.20	B130	Review and analyze survey re: omission of Parcel 1 (.3); review Notice of Intent to Abandon Claim re: same (.2); review online tax parcel map re: same (.2); coordinate revisions to title commitment re: same (.2).
07/30/20	T. Moyron	0.80	479.40	B130	Analyze United Stipulation (.2); analyze Plan in connection with United Stipulation (.2); correspond with H. Kevane re United Stipulation (.2); correspond with M. Shinderman re United Stipulation (.2).
07/30/20	R. Garms	1.70	1,025.95	B130	Work on closing documents.
07/30/20	A. Dondoyano	1.00	323.00	B130	Facilitate and deliver items requested by the title company.
07/31/20	A. Dondoyano	1.70	549.10	B130	Facilitate and deliver items requested by the title company (1.3); draft various closing documents (0.4).
07/31/20	R. Garms	3.40	2,051.90	B130	Call regarding closing checklist and follow up on same (1.2); work on closing documents (1.4); review and analyze draft closing statement (0.6); review comments to APA schedule (0.2).
07/31/20	S. Maizel	0.40	320.00	B130	Telephone conference with AHMC re closing checklist.

Seton Medical Center and Seton Coastside  
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Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	R. Westhoff	1.60	748.80	B130	Follow up on issues re: past due real estate taxes (.5); review issues re: scope of parcels included in Disclosure Schedules and status of update to title commitment to confirm same (.4); review issues and strategy re: preparation of Form 593-C for parcels to be sold (.7).
07/31/20	N. Koffroth	0.50	250.75	B130	Participate in closing checklist call with counsel to AHMC
07/31/20	T. Moyron	0.60	359.55	B130	Conference call with AHMC, BRG, Verity, et al. re closing checklist call (.4); analyze CMS, et al., emails (.2)
<b>Subtotal</b>		<b>90.20</b>	<b>46,622.18</b>		

Seton Medical Center and Seton Coastsides  
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August 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	G. Medina	0.60	175.95	B185	Review and file Notice of Executory Contracts and Unexpired Leases Designated By AHMC Healthcare Inc. For Assumption and Assignment Concerning Certain Assets Related To Seton Medical Center (0.4); send e-file copies to N. Koffroth, T. Moyron and S. Mazidel (0.2).
07/01/20	K.M. Howard	0.40	100.30	B185	Analysis of Fourth Omnibus Stipulation continuing hearing and related deadlines as to cure amounts and assumption issues and reviewed and revised Critical Dates Memorandum.
07/01/20	D. Cook	3.20	1,509.63	B185	Analysis of executory schedule in connection with cure objection extension omnibus stipulation (2.6); composition of stipulation regarding same (.6);
07/06/20	T. Moyron	0.20	119.85	B185	Analyze email from counsel for SmithGroup and respond (.1); correspond with P. Chadwick, et al. (.1).
07/06/20	N. Koffroth	0.20	100.30	B185	Participate in call with R. Adcock, H. Levy-Biehl, et al. re assumption or rejection of certain provider agreements
07/16/20	N. Koffroth	0.30	150.45	B185	Participate in call with contract counterparty re cure issues
07/23/20	K.M. Howard	0.40	100.30	B185	Analysis of Fifth Omnibus Stipulation Continuing Hearing and Related Deadlines regarding Objections to Cure Amounts and reviewed and revised Critical Dates Memorandum.
07/27/20	N. Koffroth	0.30	150.45	B185	Participate in call with H. Levy-Biehl, T. Moyron, et al. re negotiation with counterparty concerning assumption and assignment
07/29/20	G. Medina	0.40	117.30	B185	Review and file Final Notice of Executory Contracts and Unexpired Leases Designated By AHMC Healthcare Inc. For Assumption and Assignment Concerning Certain Assets Related To Seton Medical Center download and send to team.

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
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August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Final Notice of Executory Contracts and Unexpired Leases and reviewed and revised Critical Dates Memorandum.
	<b>Subtotal</b>	<b>6.40</b>	<b>2,624.83</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
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August 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	J.A. Moe, II	0.10	59.93	B190	/Hep Pharmacy v. Seton/ Review E-Mails on resolution of issues regarding Seton; confer with Karleen Murphy on status of the case.
07/14/20	K. Murphy	0.20	83.30	B190	/ Tandon / Analyze and respond to email from Elina Tilman enclosing new complaint for medical malpractice and analyze complaint (.1); and draft email to John Moe advising of new matter (.1).
07/14/20	K. Murphy	0.20	83.30	B190	/ Tandon / Draft updates to Verity Litigation Charts with new case summary information.
07/16/20	K. Murphy	0.20	83.30	B190	/ CT Corp -Tandon / Analyze CT Corporation notice and download document, and analyze summons and complaint (.1); and prepare email to Verity Team re new matter (.1).
07/16/20	K. Murphy	0.20	83.30	B190	/ Tandon / Prepare updates to Verity Litigation Management Charts with new medical malpractice complaint.
07/28/20	J.A. Moe, II	0.20	119.85	B190	/Yasovolian v. Seton/ Review multiple E-Mails on matter involving Board Of Pharmacy and request for underlying documents(.10); exchange E-Mails with Hope Levy-Biehl on documents evidencing a claim (.10).
<b>Subtotal</b>		<b>1.10</b>	<b>512.98</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

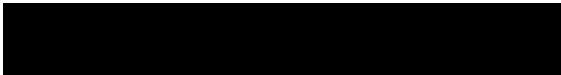
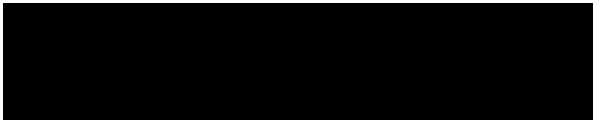
**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	S. Alberts	0.50	400.00	B220	Seton Pension. Receive letter from Local 39 pension (.1) and respond (.2) and follow ups (.2).
07/11/20	D. Cook	7.10	3,349.50	B220	Review and analysis of multiple bargaining materials with Local 39 (2.2); draft motion to reject Local 39 pension agreement (4.9).
07/12/20	D. Cook	4.70	2,217.27	B220	Draft motion to reject Local 39 pension agreement (4.4); review and analysis regarding RPHE retention materials (.3);
07/13/20	D. Cook	2.90	1,368.10	B220	Revise Motion to rejection Local 39 pension agreement (2.6); email communications with Dentons team regarding same (.3);
07/14/20	D. Cook	2.40	1,132.22	B220	Revise rejection motion pertaining to Local 39 pension agreement and trust agreement (1.4); draft application to shorten notice period materials (1.0);
07/15/20	D. Cook	3.80	1,792.69	B220	Revise Local 39 rejection materials (1.7); telephone conference with BZBM regarding same (.2); email correspondence with BZBM regarding same (.1); telephone conference with T Moyron regarding same (.4); compile exhibits pertaining to same (.7);
<b>Subtotal</b>		<b>21.40</b>	<b>10,259.78</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	A. Shiran	0.50	257.25	EMP	 review and analyze government notices (.2); discuss status of mailing with S. McCandless (.1)
07/01/20	S. McCandless	0.30	239.70	EMP	
07/02/20	S. Alberts	0.60	480.00	EMP	Seton. Conference with A. Ruda concerning state of settlement discussions (.2), receive news of Local 20 resolution and follow up with A. Ruda (.2) and conference with C. Doherty about drafting settlement agreement based on SGM format with modifications (.2).
07/02/20	C. Doherty, Jr.	0.70	261.80	EMP	Prepare 1113 Proposal for Local 20.
07/03/20	C. Doherty, Jr.	0.10	37.40	EMP	Review emails regarding 1113 process.
07/03/20	T. Moyron	0.40	239.70	EMP	Call with R. Ruda re Local 20 settlement (.1); analyze same and prepare email (.1); analyze A. Ruda, et al. emails re Local 20 settlement (.2).
07/03/20	S. Alberts	1.90	1,520.00	EMP	Seton. Review and revise Local 20 agreement and send to working group (1.3) follow up (.3) revise and send to client for approval (.2), upon approval work with A. Ruda to circulate to Local 20 (.1).
07/05/20	C. Doherty, Jr.	0.60	224.40	EMP	Review emails regarding 1113 process (.3); prepare comments to communications to unions regarding 1113 process (.3).



Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/20	S. Alberts	5.40	4,320.00	EMP	Seton. Draft communication about treatment of PTO under Seton APA and send to co-counsel for review (.3); revise draft Settlement Agreement with Local 20 to include retiree health and send (.7), communicate with A. Ruda about status of NUHW CBA due to expiration of term (.3), draft Settlement Agreement with NUHW (1.2) follow up approvals and communications with A. Ruda and Dentons team and further revisions (.8) and client (.1), draft proposal for NUHW and circulate to working group (1.8), follow up with A. Ruda (.2).
07/06/20	T. Moyron	0.40	239.70	EMP	Analyze and provide comments on Proposal Regarding Disposition of CBA and Retiree Benefits under Bankruptcy Code § 1113 and § 1114 re NUHW (.2); correspond regarding same (.2).
07/06/20	S. Alberts	9.00	7,200.00	EMP	Seton. Communicate with BRG about Seton PTO calculation (.2), receive comments and revise Local 20 letter proposal and proposal (.4) and send out to Local 20 (.2), draft letter/proposals and settlement agreements for CNA and NUHW (modify various provisions), including calls with co-counsel and outside labor counsel [REDACTED] (7.1), receive and review San Mateo sick hours announcement (.2), conference with working group about San Mateo announcement and AHMC concerning holiday and sick benefits (.6) and follow up with J. Schlant and A. Ruda (.3).
07/06/20	C. Doherty, Jr.	0.80	299.20	EMP	Add comments to 1113 Proposal Letter for Unions
07/07/20	C. Doherty, Jr.	2.90	1,084.60	EMP	[REDACTED] prepare 1113 Motion (2.4)
07/07/20	T. Moyron	0.60	359.55	EMP	Analyze R. Adcock, et al., correspondence re proposal to Local 39 (.3); Analyze T. Mainguy, et al., correspondence regarding document requests re Local 39 (.3).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	S. Alberts	5.40	4,320.00	EMP	Seton: Conference with C. Doherty status of Seton sale closing and 1113 relief (.2), conference with D. Cook to conduct research on issue (.3), communication with A. Ruda on status of Seton negotiations and next steps, including mailing of CNA letter (.2), [REDACTED] [REDACTED] send to CNA (.1) and follow up (.1), communicate about Seton 1113 Motion status (.1), email (.1) and then conference with Local 39 about 1113 process (.3), and follow up with A. Ruda concerning Local 39 (.2), communicate with M. Zeefe about Local 39 POCs and follow up for summary (.2), draft letter/proposal to Local 39 (several nuanced points) (2.5), communicate with Prime about tentative ruling (.2), send for review and approval (.1), receive various changes to letter and incorporate (.3) and send letter proposal to Local 39 (.1); obtain, review and forward retiree health plan beneficiaries and claims to NUHW, Local 20 and CNA (.2).
07/08/20	T. Moyron	0.40	239.70	EMP	Analyze matters regarding Local 39 requests.
07/08/20	S. Alberts	2.10	1,680.00	EMP	Seton 1113. Communicate with BZBM about status of union and AHMC negotiations and declaration (.2), communicate with C. Doherty about Seton 1113 Motion (.4) Seton Pension, communicate with working group about Local 39 information requests (.2) and follow up on Local 39 requests (.2), communicate with BZBM regarding summarizing negotiations with unions for 1113 motions (.2), communicate with NUHW on information requests and Proposal (.2), communicate with CNA on proposal and timing of hearing (.3), [REDACTED] (.2), follow up with D. Cook regarding research [REDACTED] (.1) and M. Zeefe concerning omnibus motion form issue (.1)
07/08/20	C. Doherty, Jr.	3.70	1,383.80	EMP	Prepare 1113 Motion

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	C. Doherty, Jr.	2.10	785.40	EMP	Prepare 1113 Motion
07/09/20	S. Alberts	5.40	4,320.00	EMP	Seton 1113. Review APA and related Motion and analyze it for 1113 relief (1.7), review and began revisions to 1113 Motion (3.2), communicate with AHMC and client about 1113 process (.5).
07/09/20	T. Moyron	0.30	179.78	EMP	Conference call with AHMC, R. Adcock, S. Alberts re labor matters and next steps.
07/10/20	D. Cook	1.10	518.94	EMP	Analysis of multiple communications regarding rejection of CBAs (.1); review and analysis of motion to reject same (.3); analysis of multiple communications regarding rejection of employer benefit plans (.2); analysis regarding rejection of Local 39 pension agreement (.5);
07/10/20	T. Moyron	2.10	1,258.43	EMP	Analyze A. Ruda, et al. correspondence re 1113 motion and declarations (.4); prepare correspondence regarding same (.4); conference call with N. Koffroth, et al., regarding declarations (.3); analyze matters related to document request and motion (.7); call with C. Doherty re 1113 motion (.3).
07/10/20	N. Koffroth	0.30	150.45	EMP	Internal call with T. Moyron, et al. re declarations in support of omnibus 1113 motion
07/10/20	N. Petts	0.20	115.60	EMP	Participate in conference call re declarations to be drafted in support of omnibus 1113 motion.
07/10/20	C. Doherty, Jr.	6.80	2,543.20	EMP	Prepare 1113 Motion (6.5); communicate with 1113 team re preparation of declarations and evidence (.3)
07/10/20	S. Alberts	3.90	3,120.00	EMP	Seton 1113. Continued revision to 1113 Motion (2.7) and circulate to working group to confirm formatting, declarations and exhibits (.3), follow up with C. Doherty (.1), receive request to extend time from Local 20 about 1113 Proposal extension and consider (.2) and respond (.1), and follow up with Local 20 (.1), communication with Local 39 about 1113 Proposal and timing of Motion (.2), follow up with C. Daugherty about removing 1114 from Motion (.2).

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/11/20	C. Doherty, Jr.	5.40	2,019.60	EMP	Prepare 1113 Motion.
07/11/20	N. Petts	1.70	982.60	EMP	Review and analyze draft omnibus 1113 rejection motion (.6); conference with Mr. Doherty re declaration for Mr. Alberts (.3); begin to draft declaration of Mr. Alberts in support of omnibus 1113 rejection motion (.8).
07/11/20	S. Alberts	0.70	560.00	EMP	Seton 1113. Communication about including AHMC Declaration to 1113 Motion (.2) and communication with counsel to AHMC (.1), follow up communications regarding status of Motion, Declaration and related materials (.4).
07/12/20	N. Petts	1.20	693.60	EMP	Finish drafting Alberts declaration.
07/12/20	C. Doherty, Jr.	7.60	2,842.40	EMP	Prepare 1113 Motion, including calls with BZMB (.4) and Dentons teams (.5); oversee Exhibit designation (2.5) and prepare document (2.1) and declarations (2.1)
07/13/20	T. Moyron	1.40	838.95	EMP	Analyze and prepare 1113 omnibus motion (.8); correspond regarding same and exhibits (.3); conference call with A. Ruda re motion and redactions (.3).
07/13/20	T. Moyron	0.40	239.70	EMP	Analyze additional correspondence from A. Ruda, et al., re labor matters.
07/13/20	S. Alberts	2.20	1,760.00	EMP	Communications about 1113 Motion and needed changes (.5), receive, review and assess CNA's response to 1113 proposal (.3) [REDACTED] (.3), communicate with Local 20 about go forward discussions (.1) and then in response to pension issues (.4), communicate with AHMC about 1113 process (.2) and follow up with T. Moyron on 1113 process and related issues (.3), email BRG [REDACTED] (.1) .
07/13/20	C. Doherty, Jr.	0.50	187.00	EMP	Identify and organize Exhibits and redactions for 1113 filing
07/13/20	N. Koffroth	4.20	2,106.30	EMP	Draft 1113 motion and related declarations of R. Adcock, A. Ruda, and S. Alberts

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/20	S. Alberts	3.60	2,880.00	EMP	Review (.8) and provide comments (.2) to Motion, Declarations, receive review and substantially revise AHMC declaration (.5), circulate AHMC declaration for internal review and communicate regarding same for approval (.2), send AHMC declaration to AHMC counsel (.1), receive, review and analyze Local 39 response to Proposal (.3), follow up with AHMC counsel (.1) receive further comments to 1113 Motion and comment (.2), follow up with co-counsel concerning Local 39 reference to separate Trust (.2), obtain and review Local 39 separate trust and ask it be incorporated into rejection (.2), further follow up with N. Koffroth about 1113 Motion (.2), [REDACTED] [REDACTED] (.2), receive and respond to communication from CNA about proposal and nonexistence of open grievances (.2) and follow up communications on timing of objections to 1113 Motion (.2).
07/14/20	T. Moyron	2.40	1,438.20	EMP	Analyze and finalize 1113 motion (1.6); analyze A. Ruda, et al., correspondence related to 1113 motion (.3); analyze correspondence related to exhibits (.2); conference calls with R. Adcock re AHMC (.1), (.2).
07/14/20	N. Koffroth	7.90	3,961.85	EMP	Draft omnibus 1113 motion re Seton CBAs
07/14/20	T. Moyron	0.60	359.55	EMP	Conference calls with R. Adcock re AHMC declaration and related issues (.2); conference calls with C. Doherty re 1113 motions, timing and AHMC (.2); conference call with S. Alberts (.1); analyze AHMC counsel, et al. declaration (.1).
07/14/20	C. Doherty, Jr.	4.20	1,570.80	EMP	Prepare AHMC Declaration (.7); prepare 1113 Motion (1.2); confirm correctness of Exhibits (1.2); calls regarding labor issues with client (.8); attention to emails re 1113 motion and requests from unions (.3)
07/15/20	C. Doherty, Jr.	0.90	336.60	EMP	Review and provide comments re AHMC motion (.6); calls with Dentons team regarding 1113 motion (.3)

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/20	T. Moyron	4.50	2,696.63	EMP	Analyze and finalize 1113 motion and declarations (1.6); analyze A. Ruda, et al., correspondence related to motion (.4); analyze A. Ruda, et al., emails re union status (.4); analyze and prepare motion to reject RPHE (.4); analyze related correspondence (.3); analyze and prepare motion to reject Local 39 agreement (.5); conference call with AHMC, R. Adcock, et al. (.5); conference calls [REDACTED] (.3), (.1).
07/15/20	N. Koffroth	0.50	250.75	EMP	Participate in calls re omnibus 1113 motion and related rejection issues with S. Alberts, A. Ruda, et al. (0.2) and M. Zeefe, C. Doherty, et al. (0.3)
07/15/20	N. Koffroth	6.80	3,410.20	EMP	Draft omnibus 1113 motion re Seton CBAs
07/15/20	S. Alberts	2.30	1,840.00	EMP	Conference with client and AHMC about closing (.5), follow up review and communications on 1113 Motion changes (1.0), communicate with A. Ruda and others on status of ratifications of new AHMC CBA with unions (.3) and follow up on filing status (.2), receive notice of one union's ratification and need to revise Motion (.2), follow up with A. Ruda on PTO issue (.1).
07/15/20	A. Shiran	0.10	51.45	EMP	Correspondence with bankruptcy team regarding employment separations in connection with Sale.
07/15/20	S. McCandless	0.20	159.80	EMP	Communicate with T. Moyron regarding employment separations in context of sale.
07/16/20	S. McCandless	0.20	159.80	EMP	Communicate with T. Moyron regarding employment separations.
07/16/20	K.M. Howard	0.40	100.30	EMP	Analysis of Omnibus Motion to Reject and Terminate Remaining Collective Bargaining Agreements with CNA, NUHW and reviewed and revised Critical Dates Memorandum.
07/16/20	N. Koffroth	5.20	2,607.80	EMP	Draft and revise omnibus 1113 motion

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/16/20	T. Moyron	1.50	898.88	EMP	Analyze A. Ruda, et al., correspondence re unions (.2); analyze final version of 1113 motion for filing (.4); analyze updated applications for order shortening time (.3); correspond with AHMC re declaration (.2); correspond regarding 1113 motion and applications (.4).
07/16/20	C. Doherty, Jr.	0.70	261.80	EMP	Review and provide comments re AHMC motion (.5); email regarding 1113 motion with Dentons team (.2)
07/16/20	S. Alberts	0.80	640.00	EMP	1113. Communicate with N. Koffroth about Adcock declaration modification (.1), follow up with D. Cook on language in pleading and declaration (.3), emails about CNA PTO issue (.2), communications about scheduling objection, reply and hearing (.2).
07/17/20	S. Alberts	0.20	160.00	EMP	1113. Communicate about potential resolutions with unions.
07/17/20	N. Koffroth	1.30	651.95	EMP	Draft notices and related documents re hearing on motions to reject Local 39 and RPHE agreements
07/17/20	C. Doherty, Jr.	0.10	37.40	EMP	Draft emails re 1113 Motion
07/17/20	T. Moyron	0.50	299.63	EMP	Analyze notice re Local 39 (.1); conference calls with N. Koffroth re same (.1), (.1); analyze order re RPHE (.1); analyze KCC correspondence (.1).
07/17/20	K.M. Howard	0.40	100.30	EMP	Analysis of the order changing deadlines reflected in Debtors' Notice and 1113 Motion to Reject and Terminate Remaining CBAs with CNA and NUHW and reviewed and revised Critical Dates Memorandum
07/17/20	A. Shiran	0.50	257.25	EMP	Evaluate employee matters in connection with temporary services agreement and correspondence regarding same (.2); discuss same with S. McCandless (.3).
07/17/20	S. McCandless	0.50	399.50	EMP	Review employee notices (.20); discuss follow up to same with A. Youssefi (.30).

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	S. Alberts	2.80	2,240.00	EMP	Communicate about status of Local 20, Local 39 and NUHW motions and potential settlements (.4), union Assess SEIU counterproposal and analyze options (.3), communicate by email (.1) and then phone with CNA about its 1113 counterproposal (.3), conference with working group (.7), draft response to counterproposal and send to working group (.8) and follow up (.2).
07/22/20	T. Moyron	0.90	539.33	EMP	Analyze correspondence re 1113 proposal and counterproposal (.3); conference call regarding same (.6).
07/23/20	S. Alberts	0.50	400.00	EMP	Revise letter to CNA, obtain approvals and send to CNA.
07/23/20	A. Shiran	0.90	463.05	EMP	
07/23/20	S. McCandless	0.70	559.30	EMP	Review information request from California EDD and proposed response (.40); discuss same with A. Youssefi (.20); communicate with R. Adcock regarding same (.10).
07/24/20	C. Doherty, Jr.	0.70	261.80	EMP	Prepare email memo re 1113 status
07/24/20	T. Moyron	0.40	239.70	EMP	Analyze matters related to CNA, Local 20, Local 39 and NUHW agreements and related correspondence.
07/24/20	S. Alberts	0.50	400.00	EMP	Communicate about CNA resolution of 1113 and follow up (.2) and other unions (.3).
07/26/20	T. Moyron	0.50	299.63	EMP	Analyze and prepare comments to 1113 motion supplement re status (.3); correspond regarding same (.2).
07/26/20	C. Doherty, Jr.	1.90	710.60	EMP	Prepare 1113 Supplement to Motion
07/27/20	C. Doherty, Jr.	2.20	822.80	EMP	Prepare 1113 Supplement to Motion (1.4); prepare, respond to and review emails re 1113 process (.8)
07/27/20	T. Moyron	0.10	59.93	EMP	Correspond with H. Levy-Biehl regarding employee letter.



Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	T. Moyron	0.20	119.85	EMP	Analyze Local 39 correspondence re letter agreement.
07/27/20	S. Alberts	4.10	3,280.00	EMP	Review and substantially revise status report and circulate for proofing (1.0), receive and accept comments (.2) and send to Dentons working team with cover note (.2), follow up communication about filing status report and adjustment due to developing facts (.6), [REDACTED] (.1), communications about NUHW settlement and changes, including review of Grievance settlement rider, comments thereto and next steps (.5) receive call from Court on status of 1113 motions and respond to Court (.2) and internally (.1), send communication to Local 39 regarding status of resolution (.2), receive response (.1), [REDACTED] (.6), request and receive redline from C. Doherty of Local 39 asks against Debtors 1113 Proposal (.1), communication to assure my personal and client's attendance at 1113 hearing (.2).
07/27/20	T. Moyron	0.50	299.63	EMP	Analyze Section 1113 status report and supplement (.2); analyze correspondence related thereto (.3).
07/28/20	C. Doherty, Jr.	0.20	74.80	EMP	Review and provide comments to Seton 1113 materials
07/28/20	S. Alberts	5.90	4,720.00	EMP	Review materials, convert and expand Proposal to Local 39 into a Settlement Agreement and circulate to working group (3.8), receive comments (.2), per discussion in pension call, revised form of Settlement Agreement and for approval (.6), communicate with co-counsel about use of stipulation format (.2) obtain approval, made small clean up change (.5) and send to Local 39 with cover note and explanation (.3), follow up with Local 39 and co-counsel (.1), learned Local 39 rejected proposal and follow up with client and co-counsel (.2).
07/28/20	S. Alberts	0.10	80.00	EMP	Review tentative ruling on 1113 relief.

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	T. Moyron	1.60	958.80	EMP	Analyze A. Ruda, et al. re labor matters (.4); analyze proposed settlement agreement re Local 39 (.4); analyze R. Adcock, et al. correspondence re same (.3); labor call with BRG, R. Adcock, S. Alberts, et al. (.5).
07/29/20	N. Koffroth	0.60	300.90	EMP	Participate in hearing re omnibus 1113 motion and rejection motions
07/29/20	S. Alberts	3.20	2,560.00	EMP	Prepare for 1113 hearing (2.7), hearing (.4), follow up (.1).
07/30/20	C. Doherty, Jr.	1.00	374.00	EMP	Prepare Order re 1113 Motion
	<b>Subtotal</b>	<b>159.10</b>	<b>94,903.31</b>		

Seton Medical Center and Seton Coastsides  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	S. Maizel	0.30	240.00	MED/CMS	Telephone conference with AHMC, etc. re Medicare/Medi-Cal issues.
07/27/20	S. Maizel	0.20	160.00	MED/CMS	Telephone conference with MaanHuei Hung re CMS settlement.
07/27/20	S. Maizel	0.80	640.00	MED/CMS	Review and respond to emails with MaanHuei Hung re CMS settlement (.4); emails to H. Levy-Beihl re same (.4).
07/30/20	T. Moyron	0.30	179.78	MED/CMS	Analyze AH&C et al., emails in updated settlement.
	<b>Subtotal</b>	<b>1.60</b>	<b>1,219.78</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K.M. Howard	0.40	100.30	MED/DHCS	Analysis of the order approving the stipulation continuing objection deadlines for DHHS and continuing the hearing and reviewed and revised Critical Dates Memorandum.
07/01/20	S. Maizel	0.60	480.00	MED/DHCS	Review and respond to emails from K. Wang re settlement of provider agreement.
07/16/20	K.M. Howard	0.40	100.30	MED/DHCS	Analysis of the Stipulation extending the deadlines and continuing the hearing on the DHHS objections to the transfer of Medi-Cal Provider Agreements and reviewed and revised Critical Dates Memorandum.
07/23/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails from F. Sze re Medi-cal appeals.
07/27/20	S. Maizel	0.60	480.00	MED/DHCS	Revising settlement agreement with DHCS.
	<b>Subtotal</b>	<b>2.10</b>	<b>1,240.60</b>		

Seton Medical Center and Seton Coastside  
Matter: 15800425-000008  
Invoice No.: 2313112

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	11,777.36
B130	Asset Disposition	46,622.18
B185	Assumption/Rejection of Leases and Contracts	2,624.83
B190	Other Contested Matters (excl. assumption/rejection motions)	512.98
B220	Employee Benefits/Pension	10,259.78
EMP	Employee matters	94,903.31
MED/CMS	Medicare/CMS Issues	1,219.78
MED/DHCS	Medi-Cal/DHCS Issues	1,240.60
Total This Matter		\$169,160.82

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	3.40	\$2,720.00
S. Alberts	\$800.00	61.10	\$48,880.00
S. Maizel	\$800.00	10.20	\$8,160.00
R. Garms	\$603.50	34.10	\$20,579.35
R. Westhoff	\$468.00	11.90	\$5,569.20
S. McCandless	\$799.00	4.60	\$3,675.40
T. Moyron	\$599.25	30.50	\$18,277.23
J.A. Moe, II	\$599.25	0.40	\$239.71
K. Murphy	\$416.50	0.80	\$333.20
A. Shiran	\$514.50	4.80	\$2,469.60
C. Doherty, Jr.	\$374.00	43.10	\$16,119.40
N. Koffroth	\$501.50	37.80	\$18,956.70
N. Petts	\$578.00	3.10	\$1,791.80
A. Dondoyano	\$323.00	26.10	\$8,430.30

Seton Medical Center and Seton Coastsides  
Invoice #: 2313112

August 30, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
D. Cook	\$471.76	25.20	\$11,888.35
G. Medina	\$293.25	1.00	\$293.25
K.M. Howard	\$250.75	<u>3.10</u>	<u>\$777.33</u>
Totals		301.20	\$169,160.82
Fee Total	\$	169,160.82	
Invoice Total	\$	<u>169,160.82</u>	

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2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313122**Matter: 15800425-000015  
St. Vincent Medical Center Foundation

Payment Due Upon Receipt

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Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

Invoice No. 2313122

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000015  
St. Vincent Medical Center Foundation

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K. Murphy	0.30	124.95	B190	/ Estate of Rosanna Forthmann / Analyze Notice of Hearing of Decedent's Estate and 81st Accounting Current & Report (.1); confer with John Moe re the same (.1); and draft email to Karen Chapman to inquire as to any hospital record of treating decedent to determine nature of issue (.1).
07/08/20	K. Murphy	0.50	208.25	B190	/ Estate of Rosanna Forthmann / Telephone calls with Nancy Reimann, counsel for trustee sending Notice of Hearing of Decedent's Estate and 81st Accounting Current & Report, including calls with John Moe (.2); draft email to Verity Team re explanation of documents (.1); and analyze multiple responses to the same as to SMF (.1); and follow up call with John Moe. (.1).
07/08/20	J.A. Moe, II	0.60	359.55	B190	/Notice Of Hearing, Roseanna Forthmann/ Telephone calls with Karleen Murphy on reason why Notice was delivered to Dentons (.10); conference call with Nancy Rineman and Ms. Murphy on status of the St. Vincent Foundation (.20); telephone call with Karleen Murphy on report to Mr. Maizel on reason for Notice (.10); exchange multiple E-Mails with Sam Maizel, Tania Moyron and Nick Koffroth on Foundation (.20);
<b>Subtotal</b>		<b>1.40</b>	<b>692.75</b>		



St. Vincent Medical Center Foundation  
Matter: 15800425-000015  
Invoice No.: 2313122

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b>Task Code</b>	<b>Task Code Name</b>	<b>Fees</b>
B190	Other Contested Matters (excl. assumption/rejection motions)	692.75
	Total This Matter	\$692.75

**TIME AND FEE SUMMARY**

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
J.A. Moe, II	\$599.25	0.60	\$359.55
K. Murphy	\$416.50	<u>0.80</u>	<u>\$333.20</u>
Totals		1.40	\$692.75
Fee Total	\$	692.75	
Invoice Total	\$	<u>692.75</u>	

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August 30, 2020

**Invoice No. 2313119**Matter: 15800425-000010  
Verity Medical Foundation

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August 30, 2020

**Invoice No. 2313119**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000010  
Verity Medical Foundation

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	T. Moyron	0.40	239.70	B130	Analyze matters related to Nant Equipment settlement agreement (.2); analyze correspondence related to motion to reject (.2).
07/09/20	P. Maxcy	0.50	369.75	B130	Work on SourceHOV closure.
07/10/20	P. Maxcy	0.50	369.75	B130	Communications with SVMD re status of SourceHOV.
07/13/20	P. Maxcy	0.40	295.80	B130	Emails with SVMD and Verity re status of SourceHOV.
07/16/20	P. Maxcy	1.10	813.45	B130	Emails with N. Haslun and others re resolution of SVMD issues.
07/17/20	P. Maxcy	0.30	221.85	B130	Conference M. Kwok re SVMD issues.
	<b>Subtotal</b>	<b>3.20</b>	<b>2,310.30</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2313119

August 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/20	K. Murphy	0.40	166.60	B190	/ Dahl / Telephone call with John Moe, Elina Tilman, and Luzann Fernandez re settlement issue (.3) and telephone call with Plaintiff's counsel re the same (.1).
07/01/20	K. Murphy	0.20	83.30	B190	/CT Corporation - Francisco Villalta (SOAR) / Telephone call with counsel serving subpoena to VHS advising of no records and SOAR subpoena required (.1); and draft email to Karen Chapman re the same (.1).
07/01/20	J.A. Moe, II	0.10	59.93	B190	/Francisco Villarta Subpoena to Verity/ Telephone call with Karleen Murphy on party seeking records .
07/01/20	J.A. Moe, II	0.40	239.70	B190	/Alana Dahl v. Verity Medical Foundation/ Conference telephone call with Luzann Fernandez, Elina Tilman and Karleen Murphy, on how to proceed with David Harris on a settlement overture,
07/01/20	J.A. Moe, II	0.40	239.70	B190	/Alana Dahl v. Verity Medical Foundation/ Conference telephone call with Luzann Fernandez, Elina Tilman and Karleen Murphy, on how to proceed with David Harris on a settlement overture.
07/07/20	K. Murphy	0.30	124.95	B190	/ Dahl / Confer with Plaintiff's counsel, David Harris, by phone and email to respond to email regarding settlement agreement (.2); and draft email to Elina Tilman advising of co-defendant settlement amount (.1).
07/07/20	K. Murphy	0.10	41.65	B190	/ Dahl / Analyzed and responded to emails from Elina Tilman re status of contact with Plaintiff's counsel, David Harris.
07/07/20	J.A. Moe, II	0.10	59.93	B190	/Alana Dahl v. Verity Medical Corporation/ Review with Karleen Murphy update on contacting Plaintiff's Counsel and extracting amount of the settlement for Luzann Fernandez and An Ruda.

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2313119

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	J.A. Moe, II	0.20	119.85	B190	/Alana Dahl v. Verity Medical Foundation/ Brief conference with An Ruda, other BZBM Attorneys, Denton's' Attorneys, and representatives of BRG and Verity, on settlement, followed by telephone call with Elina Tilman, Karleen Murphy and Elina Tilman on implications of the proposed settlement, then exchange E-Mails (on July 11th) with Karleen Murphy on mutual releases by and between all parties.
07/11/20	J.A. Moe, II	0.10	59.93	B190	/Alana Dahl v. Verity Medical Foundation/ Review An Ruda's E-Mail Memorandum to Rich Adcock on settlement and mutual release, but possible claim.
07/14/20	J.A. Moe, II	0.10	59.93	B190	/Alana Dahl v. Verity Medical Foundation/ Review multiple E-Mails from An Ruda, Rich Adcock and Karleen Murphy on proceeding with possible settlement
07/16/20	J.A. Moe, II	0.10	59.93	B190	/Alana Dahl v. Verity Medical Foundation/ Exchange E-Mails with An Ruda on contents of and review of the proposed Settlement Agreement.
07/20/20	K. Murphy	0.10	41.65	B190	/Dahl / Analyze multiple further emails from Rich Adcock and An Ruda re signature on settlement agreement.
07/23/20	K. Murphy	0.30	124.95	B190	/ CT Corp- Tammy Gaw / Analyze CT Corporation Notice re medical record subpoena, download document and analyze the same (.1); telephone call with Elina Tilman re VMF records (.1); and draft email to Verity Team re same (.1).
07/27/20	K. Murphy	0.30	124.95	B190	/ CT Corp- Julio Rodriguez / Analyze CT Corporation Notice re medical record subpoena, download document and analyze Final Notice Letter re previously served medical record subpoena (.1); telephone call with Compex re the same (.1); analyze follow up email from Compex with original medical record subpoena and draft email to Karen Chapman re the same (.1).

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2313119

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	K. Murphy	0.20	83.30	B190	/CT Corp - Zikoor / Analyze CT Corp Notice and download document (.1); analyze Notice of Withdrawal of Motion to Compel VMF to produce medical records in Zikoor matter as third party and draft email to Verity team re same (.1).
	<b>Subtotal</b>	<b>3.40</b>	<b>1,690.25</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2313119

August 30, 2020

**B210 - Business Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/20	P. Maxcy	0.40	295.80	B210	Discussions with M. Rotunno, N. Haslun re SVMD storage costs.
07/15/20	P. Maxcy	2.30	1,700.85	B210	Analysis of VMG winddown issues and respond to questions from N. Haslun re same; (1.4); respond to N. Haslun re SVMD issues (.9).
07/23/20	P. Maxcy	1.70	1,257.15	B210	Review information from N. Haslun re: SourceHOV invoices and storage and communications w/ SVMD to resolve same.
	<b>Subtotal</b>	<b>4.40</b>	<b>3,253.80</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2313119

August 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	P. Maxcy	0.60	443.70	B310	Various emails and responses to SVMD re status of claim.
07/21/20	P. Maxcy	0.70	517.65	B310	Emails with N. Haslun re SVMD resolution and review documents for same.
	<b>Subtotal</b>	<b>1.30</b>	<b>961.35</b>		



Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2313119

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	2,310.30
B190	Other Contested Matters (excl. assumption/rejection motions)	1,690.25
B210	Business Operations	3,253.80
B310	Claims Administration and Objections	961.35
Total This Matter		\$8,215.70

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
P. Maxcy	\$739.50	8.50	\$6,285.75
T. Moyron	\$599.25	0.40	\$239.70
J.A. Moe, II	\$599.25	1.50	\$898.90
K. Murphy	\$416.50	<u>1.90</u>	<u>\$791.35</u>
Totals		12.30	\$8,215.70
Fee Total		\$ 8,215.70	
Invoice Total		<u>\$ 8,215.70</u>	

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August 30, 2020

**Invoice No. 2313113**Matter: 15800425-000019  
Verity Holdings, LLC

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August 30, 2020

**Invoice No. 2313113**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000019  
Verity Holdings, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	L. Macksoud	0.50	218.88	B130	Draft email to committee re NantWorks settlement agreement and confer with C. Montgomery re same.
07/07/20	L. Macksoud	1.20	525.30	B130	Revise motion and settlement agreement per comments from C. Montgomery (.8), confer with C. Montgomery and T. Moyron re same (.2), draft email to NantWorks re same (.2).
07/07/20	C. Montgomery	0.80	640.00	B130	Review correspondence with P Saba regarding last draft of agreement and communications with L Macksoud re same (.6); phone call and further communications with L Macksoud re same (.2)
07/08/20	C. Montgomery	0.30	240.00	B130	Communications with T Moyron and L Macksoud regarding Master Lease Agreement and motion.
07/08/20	L. Macksoud	0.20	87.55	B130	Confer with C. Montgomery and counsel to NantWorks re settlement
07/09/20	C. Montgomery	1.20	960.00	B130	Review correspondence with P Saba regarding last draft of agreement and communications with L Macksoud re same (.6); phone call and further communications with L Macksoud regarding same (.2) communications with T Moyron regarding same (.1); communications with M Shinderman P Ricotta D Bleck NantWorks Lease settlement (.3)

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2313113

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	C. Montgomery	0.90	720.00	B130	Review correspondence with P Saba regarding last draft of agreement and communications with L Macksoud re same (.6); phone call and further communications with L Macksoud re same (.2) communications with T Moyron and M Shinderman regarding Master Lease settlement documentation (.1)
07/10/20	C. Montgomery	0.10	80.00	B130	Read email from Lauren Macksoud: NantWorks Settlement communications with Lauren Macksoud: RE: NantWorks Settlement.
07/14/20	L. Macksoud	1.20	525.30	B130	Finalize NantWorks settlement motion and settlement agreement in preparation for filing (1.0), confer with T. Moyron re same (.2)
07/15/20	L. Macksoud	2.00	875.50	B130	Finalize motion and settlement agreement per additional comments from T. Moyron (.7), finalize declaration and confer with R. Adcock re execution (.3), emails with client re same (.2), confer with counsel to NantWorks re same (.3), and attention to filing of same (.5),.
07/15/20	C. Montgomery	0.20	160.00	B130	Communications with T Moyron L Macksoud and P Saba regarding Master Lease settlement and filing.
<b>Subtotal</b>		<b>8.60</b>	<b>5,032.53</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2313113

August 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	K.M. Howard	0.40	100.30	B185	Analysis of Notice and First Omnibus Objection by Verity Holdings to BASM Guaranty Related Claims and reviewed and revised Critical Dates Memorandum.
	<b>Subtotal</b>	<b>0.40</b>	<b>100.30</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2313113

August 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	C. Montgomery	0.20	160.00	B300	Communications with T. Moyron and H. Kevane regardin BASM claims.
	<b>Subtotal</b>	<b>0.20</b>	<b>160.00</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2313113

August 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	T. Moyron	0.20	119.85	B310	Analyze matters related to Aetna/Basm.
07/08/20	S. Maizel	0.50	400.00	B310	Telephone conference with H. Kevane, etc. re BASM claims, etc.
07/08/20	T. Moyron	0.50	299.63	B310	Conference call with H. Kevane, H. Levy- Biehl, et al. re Aetna/BASM.
07/27/20	K.M. Howard	0.20	50.15	B310	Reviewed and revised Critical Dates Memorandum regarding BASM's deadline to file an estimation motion if they choose to do that rather than simply respond to our claim objection.
<b>Subtotal</b>		<b>1.40</b>	<b>869.63</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2313113

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	5,032.53
B185	Assumption/Rejection of Leases and Contracts	100.30
B300	Claims and Plan	160.00
B310	Claims Administration and Objections	869.63
Total This Matter		\$6,162.46

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	3.70	\$2,960.00
S. Maizel	\$800.00	0.50	\$400.00
T. Moyron	\$599.25	0.70	\$419.48
L. Macksoud	\$437.75	5.10	\$2,232.53
K.M. Howard	\$250.75	<u>0.60</u>	<u>\$150.45</u>
Totals		10.60	\$6,162.46
Fee Total		\$ 6,162.46	
Invoice Total		<u>\$ 6,162.46</u>	



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August 30, 2020

**Invoice No. 2313120**

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Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

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August 30, 2020

**Invoice No. 2313120**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000012  
 De Paul Ventures - San Jose Dialysis, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	C. Montgomery	0.40	320.00	B130	Communications with T. Conner and M. Garms regarding SCC sale impact on Priday ownership.
	<b>Subtotal</b>	<b>0.40</b>	<b>320.00</b>		

De Paul Ventures - San Jose Dialysis, LLC  
Matter: 15800425-000012  
Invoice No.: 2313120

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	320.00
	Total This Matter	\$320.00

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	<u>0.40</u>	<u>\$320.00</u>
Totals		0.40	\$320.00
Fee Total	\$	320.00	
Invoice Total	\$	<u>320.00</u>	

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**Invoice No. 2313114**Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

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Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/20	I. Hsu	1.50	669.38	APP	Correspondence and review of filing of appeal (.8); phone call with Milbank re notice of appeal (.7).
07/07/20	N. Koffroth	0.40	200.60	APP	Draft notice of appeal re vacatur order and order denying emergency motion to dismiss appeal
07/07/20	S. Martin	0.20	152.15	APP	Communications relating to notice of appeal.
07/07/20	T. Moyron	0.70	419.48	APP	Analyze J. Behrens, et al., correspondence regarding content of notice of appeal (.2); analyze correspondence from D. Eldan and M. Shinderman re joinder inquiry (.2); conference calls with N. Koffroth re same and related matters (.2), (.1).
07/08/20	I. Hsu	0.20	89.25	APP	Finalization of notice of appeal.
07/08/20	S. Martin	0.40	304.30	APP	Communications regarding appeal and stay of adversary.
07/08/20	K.M. Howard	0.40	100.30	APP	Analysis of Debtors' Notice of Appeal to the 9th Circuit and reviewed and revised Critical Dates Memorandum.
07/09/20	S. Maizel	0.20	160.00	APP	Telephone conference with UCC counsel, S. Martin, etc. re pending appeal issues.
07/09/20	S. Martin	1.20	912.90	APP	Review orders regarding stay and responsive pleading and communicate with counsel for debtors and counsel for committee regarding appeal.
07/09/20	N. Koffroth	0.40	200.60	APP	Participate in call with counsel to Committee, et al. re issues related to appeal of vacatur order

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/10/20	J.S. Zeman	0.30	164.48	APP	Researched merger doctrine re appealable orders
07/10/20	J.S. Zeman	1.10	603.08	APP	Researched deadlines for record preparation and statement of issues (.8) preparation of email memorandum (.3)
07/10/20	K.M. Howard	0.40	100.30	APP	Reviewed the AG's Notice of Appeal from the District Court rulings and determined appellants and appellees applicable deadlines and reviewed and revised Critical Dates Memorandum.
07/10/20	K.M. Howard	0.40	100.30	APP	Reviewed Verity's Notice of Appeal in the District Court rulings and determined appellants and appellees applicable deadlines and reviewed and revised Critical Dates Memorandum.
07/10/20	J.S. Zeman	2.30	1,260.98	APP	Development of Statement of Issues on Appeal (1.1), includes analysis of standing, waiver/forfeiture and estoppel issues (1.2)
07/10/20	T. Moyron	0.50	299.63	APP	Conference call with S. Martin regarding SGM filed pleadings and appeal issues.
07/13/20	N. Koffroth	0.80	401.20	APP	Participate in call with S. Martin analyzing issues related to appeal of vacatur order and order denying motion to dismiss
07/13/20	N. Koffroth	2.10	1,053.15	APP	Participate in internal calls with S. Martin, T. Moyron, et al. re issues related to appeal of vacatur order and order denying motion to dismiss appeals and related litigation issues x2 (1.1) (1.0)
07/13/20	J.S. Zeman	3.70	2,028.53	APP	Drafted Proposed statement of Issues
07/13/20	J.S. Zeman	0.80	438.60	APP	Researched Ninth Circuit standards for stay pending appeal.
07/13/20	J.S. Zeman	2.80	1,535.10	APP	Researched Divestiture doctrine.
07/13/20	S. Martin	0.20	152.15	APP	Attention to preparing list of issues on appeal and communications regarding same.
07/13/20	J.S. Zeman	0.30	164.48	APP	Conference call with Ms. Martin. Ms. Moyron, Ms. Hsu, Mr. Koffroth and Mr. Montgomery regarding strategy for motion for stay, divestiture arguments, motion to dismiss.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/20	R. Fenton	1.70	1,360.00	APP	Consult and review case materials regarding divestiture of jurisdiction and interlocutory appeal issues.
07/14/20	T. Moyron	1.30	779.03	APP	Conference call regarding SGM litigation and next steps (.5); analyze SGM, et al., emails re litigation (.2); prepare correspondence re litigation (.2); analyze jury demand and related litigation (.2); correspond with Committee counsel regarding same (.2).
07/14/20	J.S. Zeman	3.30	1,809.23	APP	Drafted edits and supplementation to the appellate statement of issues
07/15/20	J.S. Zeman	0.80	438.60	APP	Researched and confirmed rules dealing with timing and substance of designation of record.
07/15/20	S. Maizel	0.20	160.00	APP	Telephone conference with Sonia Martin, etc. re appeal issues.
07/16/20	J.S. Zeman	0.20	109.65	APP	Analyzed draft statement of issues
07/16/20	T. Moyron	0.70	419.48	APP	Analyze statement of issues and matters related to designation of the record (.4); analyze SGM, et al., correspondence re stipulation (.3).
07/16/20	K.M. Howard	0.60	150.45	APP	Analysis of the Ninth Circuit's Scheduling Order and reviewed and revised Critical Dates Memorandum (.5); prepared email to Verity team (.1).
07/16/20	C. Montgomery	0.10	80.00	APP	Review 9th Circuit scheduling Order
07/17/20	S. Maizel	0.20	160.00	APP	Telephone conference with Sonia Martin, etc. re appeal issues.
07/17/20	S. Martin	0.10	76.08	APP	Review Ninth Circuit Scheduling Order.
07/17/20	J.S. Zeman	1.80	986.85	APP	Commenced preparation of Ninth Circuit Mediation Questionnaire(.9), including review of underlying appellate filings and orders (.9).
07/19/20	G. Medina	0.10	29.33	APP	Communication with M. Zeefe regarding designation of the record work stream.
07/19/20	M. Zeefe	0.10	48.03	APP	Emails with G. Medina re designation of record in 9th Cir. appeal re SGM.
07/20/20	J.S. Zeman	3.10	1,699.58	APP	Developed responses to Mediation Statement Questionnaire for Ninth Circuit

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	J.S. Zeman	0.20	109.65	APP	Reviewed current proposed statement of issues
07/20/20	J.S. Zeman	0.20	109.65	APP	Call with Ms. Zeefe regarding designation strategy and needs for later briefing.
07/20/20	T. Moyron	0.60	359.55	APP	Analyze matters related to statement of issues and designation of the record (.4); correspond regarding same (.2).
07/20/20	K.M. Howard	0.40	100.30	APP	Reviewed emails from I. Hsu and J. Zeman regarding the Ninth Circuit Appeal (.1); reviewed Critical Dates Memorandum and cross-referenced to Scheduling Order (.2); prepared followup email to J. Zeman and I. Hsu regarding deadlines (.1).
07/20/20	G. Medina	8.70	2,551.28	APP	Review requests from T. Moyron to assist pulling documents for inclusion in the record of appeal (0.2); review form sent by K. Howard (0.1); communication with M. Zeefe regarding form (0.1); call with M. Zeefe regarding work stream (0.2) work on pulling all bankruptcy pleadings designated by J. Zeman and review district court and appellate actions (7.7 ) prepare and send draft of designation to M. Zeefe (0.4).
07/20/20	K.M. Howard	0.60	150.45	APP	Reviewed emails regarding the designation of record (.1) and responded thereto (.1); reviewed email and designation of record prepared by J. Zeman (.2); reviewed and assembled prior designation of record (.1) and prepared email to Verity Team regarding same (.1).
07/20/20	M. Zeefe	0.20	96.05	APP	Emails with G. Medina re designation of record for 9th Circuit appeal of district court vacatur (0.1); call with J. Zeman re same (0.1).
07/21/20	M. Zeefe	2.10	1,008.53	APP	Review draft designation of record (0.9); emails with team re same (0.4); calls with N. Koffroth re same (0.2); call with T. Moyron re same (0.6).
07/21/20	J.S. Zeman	1.30	712.73	APP	Reviewed draft designation of record (.3) Researched procedures for filing designation and statement of issues in contrast to excerpts of record (1.0).



Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	J.S. Zeman	0.80	438.60	APP	Analyzed and researched pending Designation of Record questions
07/21/20	J.S. Zeman	2.10	1,151.33	APP	Call with Nick Koffrath re continued vacatur research (.2), researched vacatur effect on future litigation given distinctions between vacatur arising in cases based on mootness from appellant's settlement (1.9).
07/21/20	R. Fenton	1.00	800.00	APP	Review opposition brief to motion to dismiss and edits regarding same.
07/21/20	J.S. Zeman	0.20	109.65	APP	Prepared multiple emails regarding designation of record and statement of issues
07/21/20	T. Moyron	0.40	239.70	APP	Analyze matters related to statement of issues and designation of record (.2); prepare correspondence related to same (.1); analyze same (.1).
07/21/20	G. Medina	8.60	2,521.95	APP	Communication with M. Zeefe regarding designation (0.4); continue to review district court dockets and pull pleadings related to Appellants' Statement of Issues on Appeal And Designation of Record on Appeal (7.6); Sent draft of the designation to M. Zeefe and N. Koffroth with all pleadings designated (0.4); send team draft of designation (0.1); review communication related to designation (0.1).
07/22/20	S. Martin	0.20	152.15	APP	Attention to record designations, mediation questionnaire, statement of issues.
07/22/20	G. Medina	6.20	1,818.15	APP	Call with M. Zeefe regarding Statement of Issues Designation of Items (0.4); review sample sent by M. Zeefe and N. Koffroth and work on draft of Statement of Issues and Designation including inserting basic factual information (1.4); review and inserted pages count for all designated pleadings in the bankruptcy Court and all district court pleadings (1.6); Continue to work on draft and send to M. Zeefe (0.8); Team call to go over the statement of Issues and Record on appeal (0.6); review and assembled exhibits (0.6). work on filing downloading and sending e-filed copy to team (0.8).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	M. Zeefe	7.60	3,649.90	APP	Research record requirements on appeal (1.2); call with G. Medina re same (0.3); call with N. Koffroth re same (0.5); emails with G. Medina re same (0.2); revise draft statement of issues and designation of record (4.5); calls with N. Koffroth re same (0.3); call with G. Medina re same (0.1); call with T. Moyron, N. Koffroth, J. Zeman re same (0.5).
07/22/20	J.S. Zeman	1.90	1,041.68	APP	Analyzed and prepared edits to progression of drafts of statement of issues (1.4); conference call with team to finalize edits to statement of issues (.5)
07/22/20	T. Moyron	1.10	659.18	APP	Analyze and provide comments to statement of issues and designation of the record (.4); call to finalize same (.5); correspondence regarding same (.2).
07/22/20	N. Koffroth	0.50	250.75	APP	Participate in internal call re statement of issues and designation of record
07/23/20	J.S. Zeman	0.50	274.13	APP	Review draft Ninth Circuit Mediation Questionnaire (.3) made edits (.2)
07/23/20	T. Moyron	0.50	299.63	APP	Analyze and finalize responses related to mediation.
07/23/20	M. Zeefe	2.10	1,008.53	APP	Review and revise mediation questionnaire for 9th Circuit appeal (0.5); call with T. Moyron and N. Koffroth editing same (1.6).
07/23/20	S. Maizel	0.40	320.00	APP	Telephone conference with Sonia Martin, SGM Counsel, etc re meet and confer.
07/23/20	N. Koffroth	2.60	1,303.90	APP	Draft Ninth Circuit questionnaire
07/24/20	T. Moyron	0.20	119.85	APP	Analyze J. Behrens, et al., emails re questionnaire.
07/24/20	G. Medina	0.40	117.30	APP	Review and file amended Ninth Circuit Mediation Question and send to team.
07/27/20	R. Fenton	0.10	80.00	APP	Consult Martin regarding discovery issues.
07/30/20	R. Fenton	0.70	560.00	APP	Review MTD counterclaim and comment re: same.
<b>Subtotal</b>		<b>88.00</b>	<b>41,931.82</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/03/20	T. Moyron	0.50	299.63	B130	Conference call with D. Eldan and M. Shinderman re vacatur order.
07/10/20	K.M. Howard	0.50	125.38	B130	Analysis of Defendants' Motion to Dismiss First Amended Complaint and reviewed and revised Critical Dates Memorandum (.4); reviewed Local Rules 7-9 and 7-10 to determine applicable deadlines (.1).
07/10/20	T. Moyron	0.60	359.55	B130	Analyze motion to dismiss first amended complaint (.2); analyze correspondence from SGM's counsel (.1); analyze email from B. Thomas and respond thereto (.1); analyze S. Martin, et al. correspondence (.2).
07/10/20	S. Martin	0.20	152.15	B130	Attention to updating case management statement.
07/10/20	S. Martin	3.10	2,358.33	B130	Review and analyze SGM's motion to dismiss amended complaint and outline response to same (1.5); review and analyze SGM's answer and counterclaim (.5); outline motion to stay (.4); review correspondence from SGM's counsel (.1); communicate with counsel for debtors and counsel for committee regarding same (.6).
07/10/20	I. Hsu	2.10	937.13	B130	Correspondence re docket for scheduling conference (.6); correspondence re scheduling for opposition (.9); review of MTD (.6).
07/10/20	S. Maizel	0.30	240.00	B130	Review SGM motion to dismiss adversary proceeding.
07/11/20	C. Montgomery	0.10	80.00	B130	Communications with S. Martin S. Maizel and N. Koffroth regarding SGM motion to dismiss.
07/11/20	S. Martin	1.00	760.75	B130	Further review and analyze motion to dismiss and pleadings to formulate opposition arguments (.9); communications with defense team regarding same (.1).
07/12/20	S. Martin	0.40	304.30	B130	Attention to motion to stay and related communications with debtors' counsel.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/20	N. Koffroth	0.80	401.20	B130	Analyze issues and related case law re divestiture
07/13/20	C. Montgomery	3.20	2,560.00	B130	Conference call with S. Martin, N. Koffroth regarding Motion to dismiss and stay issues (.1); continuation of conference call with T. Moyron, N. Koffroth and S. Martin (.9); participate in conference call with Jules, Isabella, N. Koffroth, S. Martin, T. Moyron (.3); follow up calls with T. Moyron (.2); participate in conference call with S. Martin, R Fenton, T. Moyron regarding overlap of appeal, stay and motion to dismiss issue (.5); review motion to dismiss and SGM Answer(1.2)
07/13/20	T. Moyron	2.70	1,617.98	B130	Conference call with S. Martin re litigation and appeal (.9); conference call with R. Fenton re SGM litigation and next steps (.5); analyze matters related to SGM's motion to dismiss and next steps (.4); conference call with R. Fenton, S. Martin re SGM motion and next steps re litigation (.9).
07/13/20	T. Moyron	0.60	359.55	B130	Further analysis related to SGM's motion to dismiss and response and next steps.
07/13/20	S. Martin	3.20	2,434.40	B130	Strategy calls and emails with debtors' counsel regarding motion to stay and motion to dismiss.
07/13/20	S. Martin	0.30	228.23	B130	Draft case management statement.
07/13/20	I. Hsu	0.60	267.75	B130	Attend strategy call on motion to stay pending appeal.
07/13/20	I. Hsu	4.00	1,785.00	B130	Edit and update rule 26(f) report (2.0); correspondence re rule 26(f) report (.5); review statement of issues (.6); research and draft motion to stay (.9).
07/14/20	C. Montgomery	0.30	240.00	B130	Communications with S. Martin and T. Moyron re SGM communication.
07/14/20	J. Whipple	6.40	3,372.80	B130	Review Defendants' Motion to Dismiss (1.4); research and draft Opposition thereto (4.1); research and draft Response to Defendants' associated Request for Judicial Notice (.9).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

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07/14/20	N. Koffroth	0.50	250.75	B130	Participate in call with S. Martin, T. Moyron, et al. re strategy issues re SGM litigation
07/14/20	I. Hsu	6.20	2,766.75	B130	Research extending time to respond to motion (2.2); draft ex parte to extend time (3.0); correspondence re ex parte and MTD (1.0).
07/14/20	S. Martin	2.00	1,521.50	B130	Email with SGM regarding briefing extension, and communications relating to same (1.1); [REDACTED] e [REDACTED] (.5); attention to jury demand (.2); outline ex parte motion (.2).
07/15/20	I. Hsu	4.90	2,186.63	B130	Edit opposition to MTD (1.0); draft stipulation, proposed order, and declaration to extend opposition deadline (2.0); correspondence re opposition deadline (.9); edit Joint 26(f) report (1.0).
07/15/20	N. Koffroth	0.20	100.30	B130	Participate in call with S. Martin, T. Moyron, et al. re case strategy issues related to motion to dismiss
07/15/20	C. Montgomery	3.80	3,040.00	B130	Communications with T. Moyron and S. Martin regarding meet and confer issues(.4); participate in conference call with S. Martin and T Moyron re same (.2); communications with S. Martin regarding Rule 26(f) statement drafts and review of same (2.9); review draft stipulation re extension of time and communications with S. Martin and SGM counsel re same (.3).
07/15/20	S. Alberts	0.20	160.00	B130	Conference with C. Montgomery about potential witnesses with respect to SGM litigation.
07/15/20	J. Whipple	4.70	2,476.90	B130	Incorporate S. Martin's additional edits and research into draft opposition to Motion to Dismiss and Martin declaration in support thereof (4.3); instruct as to preparation of Request for Judicial Notice (.4).
07/15/20	S. Martin	5.10	3,879.83	B130	Communications with SGM and debtors' counsel regarding hearing schedule and deposit (1.2); update case management statement (.7); review and comment on stipulation, declaration and order extending deadline for opposition (.8); begin drafting opposition to motion to dismiss (2.4).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/20	T. Moyron	1.10	659.18	B130	Analyze correspondence from SGM counsel (.1); prepare correspondence to Committee, et al. re same (.2); correspond with S. Martin, et al., and calls re CMC and litigation (.8).
07/16/20	K.M. Howard	0.40	100.30	B130	Analysis of Joint Stipulation to extend Plaintiffs' opposition deadline to Defendants' Motion to Dismiss and reviewed and revised Critical Dates Memorandum.
07/16/20	T. Moyron	0.80	479.40	B130	Conference call with Milbank, Mintz, S. Martin, et al. re SGM, AG, etc.
07/16/20	S. Martin	4.10	3,119.08	B130	Continue drafting opposition to motion to dismiss (2.3); attention to preparing response to cross-claims (.8); [REDACTED] (1).
07/16/20	C. Montgomery	0.70	560.00	B130	Participate in phone conference regarding SGM counterclaim possible interference with plan T. Moyron, M. Shinderman, S. Martin, D. Bleck, P. Ricottoa.
07/16/20	J. Whipple	2.30	1,212.10	B130	Incorporate additional research and S. Martin's edits into draft opposition brief to dismissal (1.8); instruct as to preparation of Answer to SGM's Counterclaims (.5).
07/16/20	I. Hsu	0.80	357.00	B130	Correspondence and revision of stipulation to extend MTD opposition deadline.
07/16/20	I. Hsu	4.10	1,829.63	B130	Edit and update citations for opposition to MTD (3.0); research case law for opposition to MTD (1.1).
07/17/20	T. Moyron	0.70	419.48	B130	Analyze correspondence from SGM's counsel (.2); analyze internal correspondence regarding meet and confer and appellate matters (.3); conference call with S. Martin and S. Maizel re SGM litigation (.2).
07/17/20	S. Martin	1.30	988.98	B130	Continue drafting opposition to motion to dismiss (.9); communicate with SGM counsel regarding case management (.2); confer with debtors' counsel regarding arguments in support of motion to dismiss cross-claims (.2).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's counterclaim, determined responsive deadline and reviewed and revised Critical Dates Memorandum.
07/17/20	J. Whipple	1.90	1,001.30	B130	Incorporate S. Martin's additional research and edits into draft dismissal opposition brief.
07/17/20	I. Hsu	3.20	1,428.00	B130	Edit opposition to MTD.
07/18/20	S. Martin	5.00	3,803.75	B130	Continue drafting opposition to motion to dismiss (4.8); initial review of defendants' edits to case management statement (.2).
07/18/20	T. Moyron	1.10	659.18	B130	Analyze and prepare comments to motion to dismiss (.9); correspond regarding same (.2).
07/19/20	S. Martin	7.30	5,553.48	B130	Continue drafting opposition to motion to dismiss (4.4); supplement Rule 26(f) report based on SGM's edits and confer with counsel for the debtors regarding same (2.1); draft response to request for judicial notice (.3); review arguments in support of motion to dismiss counterclaim (.2); communicate with debtors' counsel regarding strategy issues (.3).
07/19/20	I. Hsu	4.10	1,829.63	B130	Input edits and changes for MTD opposition.
07/19/20	C. Montgomery	3.80	3,040.00	B130	Phone calls with N. Koffroth re deposit and cash collateral aspects of the motion to dismiss (.4); review updated Rule 26(f) statement and comments re same (1.4) ; review motion to dismiss and comment on same (1.9) ; phone call with T. Moyron (.1)
07/19/20	N. Koffroth	2.70	1,354.05	B130	Draft opposition to motion to dismiss.
07/19/20	T. Moyron	1.10	659.18	B130	Analyze motion to dismiss and provide comments (.6); analyze CMC and related correspondence (.4); prepare correspondence re same (.1).
07/20/20	S. Maizel	0.30	240.00	B130	Telephone conference with SGM counsel re meet and confer.
07/20/20	I. Hsu	2.60	1,160.25	B130	Edit and revise RJN (1.2); Opp to MTD (1.4).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/20	N. Koffroth	0.30	150.45	B130	Participate in meet and confer call with counsel to SGM.
07/20/20	S. Martin	4.30	3,271.23	B130	Continue drafting opposition to motion to dismiss (.8); continue drafting Rule 26 report (.8); communications with debtors and counsel for debtors regarding same (.7); draft motion to dismiss counterclaims (.4); review mediation statement on appeal (.1); Rule 26 conference with defendants and follow up email (.5); prepare discovery requests to defendants (.5); prepare response to request for judicial notice (.4); attention to record designation on appeal (.1).
07/20/20	T. Moyron	1.60	958.80	B130	Conference call with S. Martin re SGM litigation (.2); conference call with SGM's counsel, S. Martin, et al. re meet and confer (.2); analyze CMC statement (.2) and correspondence (.4); analyze litigation steps (.6).
07/20/20	C. Montgomery	1.00	800.00	B130	Communications with S. Martin regarding updated Rule 26(f)(.9); phone call with S. Martin re same (.1)
07/20/20	J. Whipple	6.30	3,320.10	B130	Incorporate S. Martin's edits into draft dismissal brief, including additional vacatur research (2.1); edit draft opposition to Defendants' Request for Judicial Notice (.6); edit S. Martin declaration in support of dismissal opposition brief (.4); edit draft Requests for Production (1.0); begin researching and drafting motion to dismiss Defendants' counterclaim (2.2).
07/20/20	K.M. Howard	0.60	150.45	B130	Analysis of Joint Rule 26(f) Report and Discovery Plan in conjunction with updating Critical Dates Memorandum.
07/21/20	N. Koffroth	9.40	4,714.10	B130	Draft opposition to motion to dismiss first amended complaint.
07/21/20	T. Moyron	1.60	958.80	B130	Analyze motion to dismiss (.4); analyze correspondence regarding finalizing same and prepare email (.3); analyze matters related to vacatur (.3); analyze declaration and RJN (.3); internal call regarding final comments to same (.3).



Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	S. Martin	4.50	3,423.38	B130	Continue drafting opposition to motion to dismiss and supporting papers (3.8); communicate with debtors' counsel regarding same (.5); continue drafting requests for production to defendants and third parties (.2).
07/21/20	J. Whipple	6.50	3,425.50	B130	Incorporate final research into opposition brief to Defendants' dismissal motion (1.0); incorporate S. Martin's additional edits into draft document requests (.8); complete researching and first draft of motion to dismiss SGM's Counterclaims (4.1); begin drafting Answer of SGM's Counterclaims (.6).
07/21/20	I. Hsu	6.80	3,034.50	B130	Edit and revise opposition to MTD (5.0); revise RJN (1.8).
07/21/20	C. Montgomery	0.20	160.00	B130	Communications with T. Moyron and S. Martin re Verity response to motion to dismiss.
07/22/20	C. Montgomery	0.70	560.00	B130	Communications with S. Martin re meet and confer (.4); review court's scheduling and ADR orders and calendaring (.3)
07/22/20	J. Whipple	5.70	3,003.90	B130	Incorporate S. Martin's additional edits into draft document requests (.5); research and incorporate additional economic loss rule argument into draft Motion to Dismiss SGM's Counterclaims (1.8); complete first draft of Answer and Affirmative Defenses to SGM's Counterclaims, including researching necessity of filing it in conjunction with Motion to Dismiss (3.4).
07/22/20	K.M. Howard	1.10	275.83	B130	Analysis of Pre-Trial Requirements Order and Trial Order and reviewed and revised Critical Dates Memorandum.
07/22/20	I. Hsu	0.60	267.75	B130	Correspondence re designation of record.
07/22/20	I. Hsu	4.00	1,785.00	B130	Update initial disclosures (2.9); draft third party subpoenas, draft alter ego discovery (1.1).
07/22/20	S. Maizel	0.30	240.00	B130	Review and revise statement of issues.
07/22/20	S. Maizel	0.40	320.00	B130	Telephone conference with SGM counsel, etc. re meet and confer obligations.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/20	S. Martin	0.50	380.38	B130	Prepare email to SGM's counsel regarding motion to dismiss and strike counterclaim, and communicate with debtors' counsel regarding same.
07/22/20	S. Martin	0.30	228.23	B130	Review case management order.
07/23/20	S. Martin	1.90	1,445.43	B130	Analysis regarding arguments for motion to dismiss counterclaim (1.3); meet and confer with SGM's counsel (.3); confer with T. Moyron regarding same (.3).
07/23/20	J. Whipple	1.50	790.50	B130	Incorporate S. Martin's additional argument and research into draft motion to dismiss SGM's counterclaims.
07/23/20	I. Hsu	0.80	357.00	B130	Correspondence re ninth circuit mediation form (.4); review draft of ninth circuit mediation form (.2); attend meet and confer call re counterclaims (.2).
07/23/20	I. Hsu	2.10	937.13	B130	Draft document subpoenas and alter ego discovery.
07/23/20	T. Moyron	0.60	359.55	B130	Meet and confer with SGM re litigation (.4); conference call with S. Martin (.2).
07/23/20	K.M. Howard	0.60	150.45	B130	Analysis of Judge Fischer's order referring this matter to mediation and reviewed and revised Critical Dates Memorandum.
07/23/20	N. Koffroth	0.40	200.60	B130	Participate in meet and confer call re motion to dismiss filed by SGM
07/24/20	T. Moyron	3.30	1,977.53	B130	Participate in mediation with CNA, et al.
07/24/20	S. Martin	0.20	152.15	B130	Further meet and confer email to defense counsel regarding counterclaim and confer with T. Moyron regarding same.
07/24/20	S. Martin	1.60	1,217.20	B130	Draft motion to dismiss counterclaim.
07/24/20	I. Hsu	0.20	89.25	B130	Review correspondence re case scheduling and deadlines.
07/24/20	J. Whipple	1.50	790.50	B130	Circulate research regarding tolling of answer pending partial motion to dismiss, punitive damages pleading standard, and Rule 12(f) as applied to punitive damages.
07/25/20	S. Martin	2.30	1,749.73	B130	Further analysis of APA and case law following meet and confer, and discuss with T. Moyron regarding same.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/20	T. Moyron	0.90	539.33	B130	Conference call with S. Martin, et al. re SGM litigation and upcoming filings (.7); analyze related correspondence to SGM (.2).
07/26/20	C. Montgomery	0.90	720.00	B130	Participate in phone conference S. Martin, T. Moyron, S Maizel regarding motion to dismiss (.7); communications with S. Martin regarding meet and confer process (.2)
07/26/20	N. Koffroth	0.70	351.05	B130	Internal call re motion to dismiss
07/26/20	S. Maizel	0.70	560.00	B130	Telephone conference with S. Martin, etc. re MTD arguments.
07/26/20	S. Martin	0.80	608.60	B130	Strategy call regarding motion to dismiss counterclaim (.7); prepare email to SGM's counsel (.1).
07/27/20	I. Hsu	0.80	357.00	B130	Edit initial disclosures.
07/27/20	S. Martin	2.30	1,749.73	B130	Continue preparing requests for production to defendants (.6); review rules and evaluate whether answer is needed with partial motion to dismiss (.2); continue drafting motion to dismiss counterclaim (.7); review defendants' reply in support of motion to dismiss (.5); review SGM's administrative claim (.3).
07/27/20	J. Whipple	2.10	1,106.70	B130	Incorporate S. Martin's edits and additional research into draft Motion to Dismiss Counterclaims and First Requests for Production.
07/27/20	K.M. Howard	0.40	100.30	B130	Further analysis of the Order Approving Joint Stipulation regarding the hearing and deadlines on the Motion to Dismiss Complaint and the court's order taking the Scheduling Conference off calendar and reviewed and revised Critical Dates Memorandum.
07/27/20	I. Hsu	2.10	937.13	B130	Edit MTD counterclaim.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/20	S. Martin	3.90	2,966.93	B130	Communicate with debtors' counsel regarding SGM's notice of claim as related to adversary proceeding (1); continue drafting initial disclosures and communications regarding same (.3); continue drafting motion to dismiss counterclaim (1.8); review cases addressing bankruptcy court jurisdiction (.8).
07/28/20	J. Whipple	1.40	737.80	B130	Incorporate S. Martin's additional edits into draft Motion to Dismiss Counterclaims.
07/28/20	I. Hsu	4.20	1,874.25	B130	Edit MTD counterclaim (2.8); draft RJN (1.4).
07/29/20	I. Hsu	6.40	2,856.00	B130	Edit motion to dismiss counterclaims (2.2); research case law for motion to dismiss counterclaims (3.0); draft request for judicial notice and assemble exhibits for request for judicial notice (1.2).
07/29/20	J. Whipple	1.80	948.60	B130	Review and additional edits to draft motion to dismiss Counterclaims and supporting Request for Judicial Notice (1.3); identify litigation hold recipients and other recipients necessary (.5).
07/29/20	T. Moyron	0.30	179.78	B130	Analyze matters related to motion to dismiss.
07/30/20	S. Martin	2.60	1,977.95	B130	Continue drafting motion to dismiss counterclaim and communicate with debtors' counsel regarding same (2); confer with T. Moyron regarding status of bankruptcy and Prime sale (.2); prepare request for judicial notice (.4).
07/30/20	T. Moyron	0.90	539.33	B130	Conference call with S. Martin re Motion to Dismiss (.3); analyze motion to dismiss (.6).
07/30/20	T. Moyron	0.80	479.40	B130	Prepare comments to motion to dismiss (.7); analyze additional comments (.1).
07/30/20	C. Montgomery	2.60	2,080.00	B130	Review motion to dismiss counterclaims and suggestion revisions to S. Martin re same (2.6)
07/30/20	S. Maizel	0.70	560.00	B130	Review and revise MTD counterclaims.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/20	I. Hsu	5.50	2,454.38	B130	Edit and cite check MTD counterclaims (2.5); draft RJN (2.4); draft proposed order (.6).
07/31/20	I. Hsu	8.70	3,882.38	B130	Draft and finalize motion to dismiss (.6); draft proposed order (4.3); draft request for judicial notice (2.0); correspondence and phone calls re motion to dismiss (.8); oversee filing of motion to dismiss (1.0).
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents to Verity Holdings; LLC and reviewed and revised Critical Dates Memorandum.
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents, Interrogatories and Requests for Admission to Verity Health System of California, Inc., and reviewed and revised Critical Dates Memorandum.
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents, Interrogatories and Requests for Admission to Verity Holdings, LLC, and reviewed and revised Critical Dates Memorandum.
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents, Interrogatories and Requests for Admission to Seton Medical Center and reviewed and revised Critical Dates Memorandum.
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents, Interrogatories and Requests for Admission to St. Vincent Medical Center and reviewed and revised Critical Dates Memorandum.
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents, Interrogatories and Requests for Admission to St. Vincent Dialysis and reviewed and revised Critical Dates Memorandum.
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of SGM's First Request for Production of Documents, Interrogatories, Requests for Admission to St. Francis Medical Center and reviewed and revised Critical Dates Memorandum.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/20	K.M. Howard	0.40	100.30	B130	Email exchanges with S. Martin regarding discovery served by SGM (.2); reviewed received documents and prepared email to A. Aguilar regarding missing discovery for St. Vincent Dialysis (.2).
07/31/20	K.M. Howard	0.40	100.30	B130	Analysis of Plaintiffs' Motion to Dismiss Counterclaims, or in the alternative, Motion to Strike and reviewed and revised Critical Dates Memorandum.
07/31/20	C. Montgomery	0.70	560.00	B130	Communications with S. Martin regarding latest version of motion to dismiss and comments re same.
07/31/20	T. Moyron	1.00	599.25	B130	Analyze final version of motion to dismiss (.2); analyze emails regarding same (.2); conference call with S. Martin re motion to dismiss (.6).
07/31/20	S. Martin	4.80	3,651.60	B130	Continue drafting motion to dismiss counterclaim and supporting papers, and communications relating to same (4.1); review discovery from defendants (.7).
<b>Subtotal</b>		<b>243.60</b>	<b>141,746.67</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/20	T. Moyron	0.30	179.78	B300	Analyze SGM admin expense motion (.1); prepare email to R. Adcock, et al. re same (.1); prepare email to Milbank and Mintz re same (.1).
	<b>Subtotal</b>	<b>0.30</b>	<b>179.78</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2313114

August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	41,931.82
B130	Asset Disposition	141,746.67
B300	Claims and Plan	179.78
Total This Matter		\$183,858.27

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	18.10	\$14,480.00
R. Fenton	\$800.00	3.50	\$2,800.00
S. Alberts	\$800.00	0.20	\$160.00
S. Maizel	\$800.00	3.70	\$2,960.00
S. Martin	\$760.75	65.30	\$49,677.05
J.S. Zeman	\$548.25	27.70	\$15,186.58
T. Moyron	\$599.25	26.50	\$15,880.21
M. Zeefe	\$480.25	12.10	\$5,811.04
J. Whipple	\$527.00	42.10	\$22,186.70
N. Koffroth	\$501.50	21.80	\$10,932.70
I. Hsu	\$446.25	76.50	\$34,138.17
G. Medina	\$293.25	24.00	\$7,038.01
K.M. Howard	\$250.75	<u>10.40</u>	<u>\$2,607.81</u>
Totals		331.90	\$183,858.27

Fee Total \$ 183,858.27

Invoice Total \$ 183,858.27



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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

August 30, 2020

**Invoice No. 2313115**

Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

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S. Maizel  
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Page 994 of 1233

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August 30, 2020

**Invoice No. 2313115**

For Professional Services Rendered through July 31, 2020:

Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/20	A. Shiran	2.70	1,389.15	B190	Draft mediation brief arguments on state law claims (2.2); conduct research in support of same (.5)
07/07/20	A. Shiran	1.90	977.55	B190	Receipt and review of JAMS mediation and engagement agreements (.3); [REDACTED] [REDACTED] (1.4)
07/07/20	T. Moyron	0.10	59.93	B190	Analyze A. Youssefi, et al., correspondence re mediation agreement.
07/07/20	S. McCandless	2.40	1,917.60	B190	Review current version of Mediation Brief (.90); provide comments and additional language to A. Youssefi (1.20); complete mediation forms (.30).
07/08/20	A. Shiran	2.60	1,337.70	B190	Continue drafting and revising mediation brief (1.4 ); discuss revisions to same with S. McCandless (1.2).
07/08/20	S. McCandless	2.60	2,077.40	B190	Review mediation brief for revisions and additions to same (1.40); provide input for revisions and additions to A. Youssefi (1.20). .
07/09/20	S. Martin	0.30	228.23	B190	Review draft mediation statement.
07/09/20	A. Shiran	3.30	1,697.85	B190	Discuss introduction of mediation brief and revisions to same with S. McCandless (1.1); revise mediation brief introduction and background fact section (2.2)

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2313115

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/09/20	S. McCandless	3.60	2,876.40	B190	Create list of additional information needed for Mediation Brief and provide same to A. Youssefi (.30); review entire current version of Mediation Brief (.80); draft and revise Introduction to Mediation Brief and initial fact section to provide more detailed information and background (.90); discuss same with A. Youssefi (.40); review further revisions received from A. Youssefi (.50); discuss further revisions to Mediation Brief with A. Youssefi and finalize same (.70).
07/09/20	D. Cook	0.40	188.70	B190	Review and analysis of mediation brief.
07/10/20	S. Alberts	0.40	320.00	B190	CNA Litigation. Review and comment on Answer to Complaint (.3) and follow up (.1).
07/10/20	A. Shiran	0.60	308.70	B190	[REDACTED]
07/10/20	S. McCandless	1.70	1,358.30	B190	Further review and analyze current draft of mediation brief (1.10); [REDACTED] y and anticipated further additions/revisions with A. Youssefi (.60).
07/10/20	T. Moyron	0.50	299.63	B190	Analyze mediation statement (.2); correspondence regarding same (.2); analyze correspondence re mediation agreement, etc. (.1).
07/11/20	S. Maizel	0.80	640.00	B190	Review and revise mediation brief.
07/11/20	S. McCandless	1.30	1,038.70	B190	Initial review and analysis of proposed changes to Mediation Brief from T. Moyron and S. Maizel (1.20); communicate with L. Fernandez regarding Mediation Brief (.10).
07/12/20	S. McCandless	3.60	2,876.40	B190	Review and detailed annotation/revision of various proposed further changes to Mediation Brief and following comments from Moyron/Maizel (1.30); communicate with T. Moyron regarding same (.10); provide additional comments to A. Youssefi and further draft and revise Mediation Brief with A. Youssefi (2.10); communicate with Bartko regarding same (.10).

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2313115

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/20	A. Shiran	2.10	1,080.45	B190	Draft and revise mediation brief in conjunction with discussion with S. McCandless.
07/13/20	A. Shiran	3.90	2,006.55	B190	Receipt and review of mediation brief for individual defendants provided by A. Ruda (.9). review and revise evidentiary and legal cites in mediation brief (.7) ; discuss mediation brief with S. McCandless (.7) discuss Bartko mediation brief and needed revisions thereto with S. McCandless (1.3) multiple correspondence with T. Moyron regarding mediation briefs (.1) further telephone conference regarding needed revisions to mediation brief in particular in fact section (.2).
07/13/20	S. McCandless	4.10	3,275.90	B190	Review latest version of mediation brief (.60); edit same with A. Youssefi (.70); communicate with T. Moyron regarding same (.20); review first draft of Bartko brief (.40); initial annotations to same for necessary changes (.40); discussed needed revisions to same with A. Youssefi (1.30); telephone call with T. Moyron regarding same (.30); communicate with R. Adcock and P. Chadwick regarding remaining facts needed for Mediation Brief (.20).
07/13/20	T. Moyron	0.80	479.40	B190	Conference call with S. McCandless re mediation briefs (.2); conference call with R. Adcock re mediation brief (.1); follow up call with S. McCandless re same (.1); analyze BZBM mediation brief (.2); analyze BZBM, et al., emails re mediation (.2).
07/14/20	T. Moyron	1.10	659.18	B190	Finalize mediation brief.
07/14/20	T. Moyron	2.70	1,617.98	B190	Analyze, prepare and finalize mediation briefs (2.4); correspondence regarding same (.3).
07/14/20	C. Montgomery	2.30	1,840.00	B190	Review and comment upon Verity Mediation Statement for CNA litigations (2.1); communications with S McCandless re same (.1); communications with K Howard regarding critical dates and motion to withdraw reference (.1)

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
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August 30, 2020

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07/14/20	S. Alberts	0.20	160.00	B190	Communication regarding mediation (.2).
07/14/20	S. Maizel	0.40	320.00	B190	Review and revise inserts re mediation brief.
07/14/20	A. Shiran	7.90	4,064.55	B190	Revise mediation brief and incorporate bankruptcy team comments (4.1); review and prepare proposed edits to Bartko mediation brief (.9 ) discuss Bartko mediation brief with S. McCandless (.5) discuss revisions to Verity Mediation brief with S. McCandless (.6) discuss bankruptcy team revisions with S. McCandless (.8) telephone conference with T. Moyron and A. Ruda regarding fact sections in mediation brief (.2); multiple correspondence with internal team regarding information request from mediator and prepare response to same (.3); numerous further correspondence with bankruptcy team regarding revisions to mediation brief (.5).
07/14/20	S. Martin	0.40	304.30	B190	Review and comment on mediation statement.
07/14/20	S. McCandless	5.20	4,154.80	B190	Communicate with S. Martin regarding mediation brief (.10); communicate with S. Adcock and P. Chadwick regarding additional facts needed for Verity mediation brief and review responses to same for incorporation into Mediation Brief (.50); discuss further revisions to Mediation Brief with A. Youssefi in context of latest review and further correspondence (.60); communicate with T. Moyron regarding Bartko brief (.20); review C. Montgomery's proposed changes to Verity Mediation Brief (.20); [REDACTED] (.80); annotate initial draft of Bartko mediation brief for proposed revisions to same (.70); discuss and finalize same with A. Youssefi for provision to Bartko team (.50); conference call with T. Moyron, A. Ruda, and A. Youssefi to discuss revisions to fact section of Bartko mediation brief (.20); review T. Moyron's ensuing revised fact section (.20); final review of Dentons Mediation Brief

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
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August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					(.40); communicate with T. Moyron and A. Youssefi regarding further and final revisions to Dentons Mediation Brief (.50); review T. Moyron's and S. Maizel's final edits to Mediation Brief and communicate with T. Moyron and A. Youssefi regarding same (.30).
07/15/20	S. McCandless	0.20	159.80	B190	
07/15/20	K.M. Howard	0.40	100.30	B190	Analysis of the Court's Notice to continue the hearing on CNA's Motion to Withdraw Reference in CNA v. Verity and reviewed and revised Critical Dates Memorandum.
07/15/20	S. Martin	0.10	76.08	B190	Review and calendar order continuing hearing on motion to withdraw.
07/15/20	A. Shiran	0.40	205.80	B190	Correspondence regarding mediation brief to Judge Coar (.2);
07/17/20	S. Martin	0.10	76.08	B190	Communicate with debtors' counsel regarding mediation preparation.
07/17/20	A. Shiran	0.10	51.45	B190	Further correspondence with mediator's office in anticipation of mediation and provide signed mediation agreement.
07/20/20	T. Moyron	1.80	1,078.65	B190	Internal call to prepare for CNA mediation (.5); conference call with A. Ruda re CNA mediation (.5); prepare for CNA mediation (.6); exchange emails with P. Chadwick re mediation documents (.2).
07/20/20	N. Koffroth	0.40	200.60	B190	Draft opening statement re CNA mediation
07/20/20	S. Alberts	0.70	560.00	B190	Conference with working group in advance of mediation (.5) and follow up (.2).
07/20/20	S. Maizel	0.50	400.00	B190	Telephone conference with S. Alberts, etc. re CNA mediation.
07/20/20	A. Shiran	4.90	2,521.05	B190	Prepare for mediation (1.9) preparation of opening statement (1.8); call with T. Moyron and S McCandless in preparation for mediation (.5); call with An Ruda and bankruptcy team in preparation for mediation (.7).

Adv. Proceeding - California Nurses association (CAN) v.  
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August 30, 2020

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07/20/20	S. McCandless	4.90	3,915.10	B190	<p>[REDACTED]</p> <p>[REDACTED] (.20); communications with Bartko team [REDACTED] (.20); telephone call with A. Youssefi in preparation for Mediation (.30); [REDACTED] (.50); further telephone call with A. Youssefi in preparation for Mediation (.50); [REDACTED] (.70); communicate with JAMS Administrator in preparation for Mediation (.20); continued Mediation preparation: review notes of earlier discussion with Judge Coar (.40); review and edit A. Youssefi's opening statement (.70); further communicate with A. Youssefi regarding same (.20); review mediation bullet points from A. Ruda (.10).</p>
07/21/20	A. Shiran	10.40	5,350.80	B190	<p>Prepare for mediation, i [REDACTED] and opening statement (1.5); attend mediation with CNA (8.5); review and revise term sheet (.4)</p>
07/21/20	C. Doherty, Jr.	0.80	299.20	B190	<p>Prepare Term Sheet (.6); discuss mediation and mediation term sheet with Ms. Moyron (.2)</p>
07/21/20	S. Maizel	0.90	720.00	B190	<p>Review and respond to email from P. Chadwick re mediation (.5); telephone conference with T. Moyron re same (.4).</p>
07/21/20	S. McCandless	8.70	6,951.30	B190	<p>Represent Verity at Mediation with CNA (8.20); initial work on/review of preliminary draft of term sheet (.50).</p>
07/21/20	T. Moyron	8.20	4,913.85	B190	<p>Participate in CNA mediation.</p>
07/21/20	T. Moyron	2.30	1,378.28	B190	<p>Prepare settlement term sheet (1.8); conference call with A. Ruda re same (.5).</p>

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2313115

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/20	T. Moyron	1.20	719.10	B190	Prepare for mediation (.9); conference call with R. Adcock prior to mediation (.3).
07/21/20	S. Martin	7.10	5,401.33	B190	Prepare for and attend mediation via Zoom.
07/21/20	S. Alberts	5.80	4,640.00	B190	Review briefing and prepare for mediation (.7), mediation (5.0) and follow up to provide form of settlement agreement (.1).
07/22/20	C. Montgomery	0.70	560.00	B190	Phone call with T Moyron regarding CNA mediation and claim settlement.
07/22/20	A. Shiran	1.30	668.85	B190	Discuss term sheet and release agreement with bankruptcy team and labor team (.7); review and analyze terms and language for same and discuss with S. McCandless (.6)
07/22/20	S. Martin	1.00	760.75	B190	Attention to settlement term sheet and related communications with debtors' counsel.
07/22/20	T. Moyron	1.70	1,018.73	B190	Analyze A. Ruda, et al., correspondence related to CNA term sheet (.3); analyze updated term sheet (.3); conference call with A. Ruda, et al., re CNA term sheet (.7); conference call with C. Doherty re changes to term sheet (.2); conference call with R. Adcock re same (.1); prepare correspondence re term sheet (.1).
07/22/20	T. Moyron	0.60	359.55	B190	Analyze and finalize CNA term sheet (.4); further correspondence regarding same (.2).
07/22/20	S. McCandless	2.00	1,598.00	B190	Communicate with bankruptcy and labor teams to provide input for drafting of settlement terms (.70); bankruptcy and labor team call to discuss term sheet and release agreement (.70); discuss and analyze same with A. Youssefi in preparation for team call (.60).
07/22/20	C. Doherty, Jr.	0.70	261.80	B190	Prepare Term Sheet based on comments from team
07/23/20	C. Doherty, Jr.	1.00	374.00	B190	Prepare CNA Term Sheet (.6); [REDACTED] (.4)
07/23/20	S. Alberts	0.20	160.00	B190	Communications about settlement.



Adv. Proceeding - California Nurses association (CAN) v.  
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August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/20	A. Shiran	1.70	874.65	B190	Review settlement term sheet and analyze proposed edits thereto including revisions to release language (.7); discuss further revisions with S. McCandless (.8); multiple internal correspondence regarding same (.2).
07/23/20	N. Koffroth	0.80	401.20	B190	Draft CNA litigation settlement term sheet
07/23/20	S. McCandless	2.40	1,917.60	B190	Review of settlement term sheet (70); discuss revisions to same with A. Youssefi (.80); draft and forward comments/revisions to same to C. Doherty (.60); review C. Doherty's responses (.10); further communicate with C. Doherty regarding same (.20).
07/23/20	S. Martin	0.10	76.08	B190	Communications relating to further session with mediator.
07/24/20	S. McCandless	3.60	2,876.40	B190	Participate in CNA Mediation (3.30); refresher review of term sheet in preparation for same (.30).
07/24/20	S. Alberts	3.90	3,120.00	B190	Review and assess current form of settlement agreement (.3), participate in mediation (3.5) and follow up (.1).
07/24/20	A. Shiran	3.50	1,800.75	B190	Further mediation with Judge Coar in connection with finalization of term sheet.
07/24/20	S. Martin	2.50	1,901.88	B190	Attend continued session with mediator.
07/28/20	A. Shiran	4.80	2,469.60	B190	Draft settlement agreement (3.6); review and analyze release terms and term sheet in connection with drafting settlement agreement (.9); correspondence with bankruptcy team relating to same (.3)
07/28/20	S. McCandless	1.10	878.90	B190	Review settlement agreement in context of term sheet in preparation for discussion of same with A. Youssefi (.80); initial discussion with A. Youssefi regarding same (.30).
07/29/20	S. Martin	3.50	2,662.63	B190	Continue drafting motion to dismiss counterclaim (3.3); supplement legal hold (.2).

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2313115

August 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/20	A. Shiran	0.80	411.60	B190	Discuss settlement terms with S. McCandless (.5); review S. Alberts comments to settlement and incorporate same (.3).
07/29/20	S. Alberts	0.40	320.00	B190	Review and provide comments to settlement agreement.
07/29/20	S. McCandless	1.50	1,198.50	B190	Review Settlement Agreement (.90); revise same with A. Youssefi (.50); review S. Alberts further changes to Agreement (.10).
07/30/20	T. Moyron	0.50	299.63	B190	Analyze updated CNA settlement and provide comments (.2); correspond regarding same (.3).
07/30/20	S. Alberts	0.70	560.00	B190	Review and approve insert to settlement agreement (.3), communicate with T. Moyron about inclusion of CBA resolution in settlement agreement (.1), CW WSNA about inclusion and approval (.2) and advise co-counsel regarding same (.1).
07/30/20	A. Shiran	1.20	617.40	B190	Revise settlement based on further input from bankruptcy team (.7); multiple correspondence with A. Ruda regarding settlement terms (.3); correspondence with K. Skogstad regarding settlement draft (.1); correspondence with client regarding settlement draft (.1)
07/30/20	S. McCandless	1.20	958.80	B190	Review settlement agreement and further review term sheet for analysis of same (.60); provide revisions to same to A. Youssefi (.20); communicate with A. Ruda regarding revisions (.30); communicate with T. Moyron regarding eventual signature process (.10).
07/31/20	S. McCandless	0.60	479.40	B190	Review CNA's proposed revisions to settlement agreement and related comments (.40); communicate with A. Youssefi regarding same (.20).
07/31/20	A. Shiran	0.60	308.70	B190	Receipt and review of settlement revisions from CNA (.4) evaluate same and discuss comments with bankruptcy and labor teams (.2).
<b>Subtotal</b>		<b>164.40</b>	<b>109,169.52</b>		

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20-ap-01051-ER  
Matter: 15800425-000021  
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August 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B190	Other Contested Matters (excl. assumption/rejection motions)	109,169.52
	Total This Matter	\$109,169.52

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	3.00	\$2,400.00
S. Alberts	\$800.00	12.30	\$9,840.00
S. Maizel	\$800.00	2.60	\$2,080.00
S. Martin	\$760.75	15.10	\$11,487.36
S. McCandless	\$799.00	50.70	\$40,509.30
T. Moyron	\$599.25	21.50	\$12,883.91
A. Shiran	\$514.50	54.70	\$28,143.15
C. Doherty, Jr.	\$374.00	2.50	\$935.00
N. Koffroth	\$501.50	1.20	\$601.80
D. Cook	\$471.76	0.40	\$188.70
K.M. Howard	\$250.75	<u>0.40</u>	<u>\$100.30</u>
Totals		164.40	\$109,169.52
Fee Total	\$	109,169.52	
Invoice Total	\$	<u>109,169.52</u>	

# Exhibit G

DENTONS

Main Document

Page 1 of 1  
Page 1 of 1

SNR Denton US LLP

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Los Angeles, California 90017-5704

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321656**

Matter: 15800425-000003  
Verity Health System of California

Payment Due Upon Receipt

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Total This Invoice	\$ 900,956.23
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321656**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000003  
Verity Health System of California

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/20	K.M. Howard	0.40	100.30	APP	Analysis of Notice of Appeal and Statement of Election filed by Toyon Associates and reviewed and revised Critical Date Memorandum.
08/27/20	S. Maizel	0.50	400.00	APP	Telephone conference with Paul Pascuzzi, etc. re Toyon appeal issues.
09/01/20	S. Maizel	0.40	320.00	APP	Telephone conference with Paul Pascuzzi re Toyon appeal of confirmation order (.3); review and respond to emails re same (.1).
09/01/20	K.M. Howard	0.40	100.30	APP	Analysis of notice of filing of notice of appeal received from LASC in Chow v. Verity and reconciled information and requirements with Critical Dates Memorandum.
09/02/20	K.M. Howard	0.60	150.45	APP	Further analysis of Toyon Associates' Notice of Appeal and analysis of documents received from the District Court and reviewed and revised Critical Dates Memorandum accordingly.
09/03/20	S. Maizel	0.90	720.00	APP	Telephone conference with P. Pascuzzi re Toyon appeal (.2); telephone conference with T. Moyron, etc. re same (.2); review and respond to emails re same (.5).
09/03/20	G. Medina	3.20	938.40	APP	Revise and Edits to appendix Exhibits and file in the District Court the Debtors Opposition To Strategic Global Management, Inc.'s Emergency Motion To Stay Confirmation Order with Appendix and Exhibits in Support (2.2); Download and Send E copies of Opposition and Appendix with Exhibits to S. Maizel, T. Moyron and N. Koffroth (1.0).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	S. Maizel	1.20	960.00	APP	Telephone conference with T. Moyron re Toyon issues, etc. (.2); telephone conference with P. Pascuzzi re same (.1); review and revise settlement agreement with Toyon (.3); review and respond to emails re Toyon settlement (.5); telephone conference with N. Koffroth re stipulation with Toyon (.1).
09/04/20	N. Koffroth	0.40	200.60	APP	Draft stipulation and order dismissing Toyon appeal of confirmation order
	<b>Subtotal</b>	<b>8.00</b>	<b>3,890.05</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B100 - Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	M. Zeefe	2.10	1,008.53	B100	Review docket updates and circulate key dates from upcoming week to core team.
08/07/20	K.M. Howard	0.30	75.23	B100	Reviewed, revised and finalized Critical Dates Memorandum.
08/10/20	S. Alberts	0.20	160.00	B100	Review notices.
08/10/20	K.M. Howard	1.10	275.83	B100	Reviewed and revised Master Critical Dates Memorandum (.8); email exchanges with M. Zeefe regarding reconciliation of dates (.3).
08/10/20	M. Zeefe	1.70	816.43	B100	Review updated docket and circulate upcoming key dates to core team.
08/17/20	K.M. Howard	0.70	175.53	B100	Reviewed and revised master critical dates memorandum and reconciled to new deadlines set by the court (.5); prepared email to Verity Team (.2).
08/17/20	M. Zeefe	1.70	816.43	B100	Review docket and circulate key dates from upcoming week to core team.
08/23/20	S. Alberts	1.00	800.00	B100	Review mail received thus far during course of pandemic.
08/24/20	M. Zeefe	0.60	288.15	B100	Review docket and circulate key dates from upcoming week to core team.
08/31/20	K.M. Howard	0.60	150.45	B100	Reviewed, revised and finalized Critical Dates Memorandum for the week of August 31, 2020 (.4); culled key events and hearings and prepared email to Verity Team regarding same (.2).
08/31/20	M. Zeefe	1.10	528.28	B100	Review docket and critical dates memorandum and update key dates.
09/04/20	S. Alberts	0.20	160.00	B100	Plan review Notice of confirmation.
<b>Subtotal</b>		<b>11.30</b>	<b>5,254.86</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	G. Medina	6.90	2,023.43	B110	Work on draft of Integrity Stipulation (0.5); Call with T. Moyron regarding call on Administrative claims calls(0.2); review docket and pull Second administrative bar date and send to T. Moyron (0.3); reviewed and Lodged PBGC Order per the request of M. Zeefe (0.3); call with Dentons and BRG regarding administrate claims (1.3); review articles related to issue on the call with Houlihan Lokey and send to J. Slant ( 0.5); Communication with T. Moyron and N. Koffroth regarding Objection and response deadlines to Integrity Stipulation (0.1); communication with Zeefe regarding PBGC Order (0.1); revised stipulation and send to P. Saba for his consideration (0.4); Communicating with C. Doherty regarding lodging order related to Docket No.5052 (0.2); work on lodging Order (0.1); call with N. Koffroth regarding Lodging order and Integrity Stipulation (0.3); call Judge's Deputy Clerk regarding lodging Order left voice mail (0.1); Further revised Stipulation with Integrity to include prior filing (0.3); received revised integrity from P. Saba and communication with T. Moyron and N. Koffroth related to same (0.1); communication with C. O'Meara re T. Moyron filing Credentials (0.1); revised integrity order to reflect second stipulation and send to N. Koffroth (0.2); filed stipulation and upload order (0.3); received and reviewed from J. Schlant Administrative claim and recover hurdle analysis in preparation for the call (0.3); continued call to (1.2).
08/05/20	G. Medina	2.00	586.50	B110	Assist with Numerous filings including confirmation brief.
08/11/20	S. Maizel	0.30	240.00	B110	Telephone conference with BRG, etc. re closing issues.
08/15/20	T. Moyron	0.50	299.63	B110	Call with D. Galfus (.1), (.2), (.2) re case matters, meeting with LT, etc.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/15/20	K.M. Howard	0.40	100.30	B110	Email exchange with T. Moyron regarding the confirmation hearing (.1); prepared Transcript Request Form (.2); filed same (.1).
08/17/20	S. Maizel	0.50	400.00	B110	Telephone conference with T. Moyron, etc. re statutory deadlines issues.
08/17/20	T. Moyron	1.00	599.25	B110	Conference call with Howard Grobstein, BRG, et al re background.
08/17/20	K.M. Howard	0.20	50.15	B110	Email exchange with R. Roper of Hyatt Court Reporters regarding the transcript of the hearing for August 12th (.1); prepared email to A. Aguilar regarding same (.1).
08/19/20	K.M. Howard	0.30	75.23	B110	Email exchanges with T. Moyron and M. Hyatt regarding hearing transcript review and corrections to same (.2); email exchange with T. Moyron regarding time line to finalize review of transcript (.1).
08/20/20	T. Moyron	0.70	419.48	B110	Call with R. Adcock sale and case matters (.2); call with S. Maizel re same (.2); call with P. Chadwick re same (.1), (.2).
08/21/20	S. Maizel	1.10	880.00	B110	Telephone conference with R. Adcock, etc. re pending issues (.9); telephone conference with T. Moyron re same (.2).
08/24/20	K.M. Howard	0.40	100.30	B110	Email exchange with Hyatt Court Reports regarding the 8/12/20 hearing transcript (.1); email exchange with T. Moyron regarding same (.1); email exchange with T. Moyron regarding final corrections (.1); prepared email to K. Persuad regarding transcript corrections (.1).
08/24/20	T. Moyron	2.00	1,198.50	B110	Call with R. Adcock re insurance, plan, other matters, etc. (.3); call with C. Montgomery re Nant equipment payment, plan, and other matters (.6); call with C. Montgomery and D. Galfus re insurance and other matters (.3); call with S. Maizel re case management and agenda (.3); call with M. Garms and R. Adcock re resolutions (.2); call with D. Galfus and P. Chadwick re plan and certain effective date payments (.2); call with P. Chadwick re hurdle (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	S. Maizel	0.30	240.00	B110	Telephone conference with Felicia Sze, etc. re pending Medi-Cal and Medicare appeals.
08/25/20	T. Moyron	1.00	599.25	B110	Conference call with H. Grobstein, R. Adcock, H. Levy-Biehl, BRG, et al.
08/25/20	T. Moyron	2.00	1,198.50	B110	Call with R. Adcock re insurance, plan, other matters, etc. (.3); call with C. Montgomery re Nant equipment payment, plan, and other matters (.6); call with C. Montgomery and D. Galfus re insurance and other matters (.3); call with S. Maizel re case management and agenda (.3); call with M. Garms and R. Adcock re resolutions (.2); call with D. Galfus and P. Chadwick re plan and certain effective date payments (.2); call with P. Chadwick re hurdle (.1).
08/25/20	K.M. Howard	3.40	852.55	B110	Telephone conference with M. Garms (.1); accessed Cain Brothers Dataroom and assembled bylaws for all Debtors (3.1); prepared emails to M. Garms (.2).
08/26/20	K.M. Howard	0.40	100.30	B110	Email exchanges with K. Persuad of Hyatt Reporters regarding the status of the 8/12/20 hearing transcript (.1); received and reviewed corrected transcript (.2); prepared email to Verity Team regarding same (.1).
08/26/20	N. Koffroth	1.00	501.50	B110	Participate in weekly internal call with R. Adcock, P. Chadwick, et al.
08/27/20	K.M. Howard	0.70	175.53	B110	Prepared Application of Non-Resident Attorney, Brigitte McGrath, to Appear Pro Hac Vice (.4); prepared related order (.2); prepared email to N. Koffroth regarding all admissions pro hac vice (.1).
08/27/20	K.M. Howard	0.60	150.45	B110	Prepared Application of Non-Resident Attorney, Gary Underdahl, to Appear Pro Hac Vice (.4); prepared related order (.2)
08/27/20	K.M. Howard	0.60	150.45	B110	Prepared Application of Non-Resident Attorney, Nicholas Brown, to Appear Pro Hac Vice (.4); prepared related order (.2)
08/27/20	T. Moyron	0.70	419.48	B110	Conference call with N. Koffroth re claims, plan and other matters.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

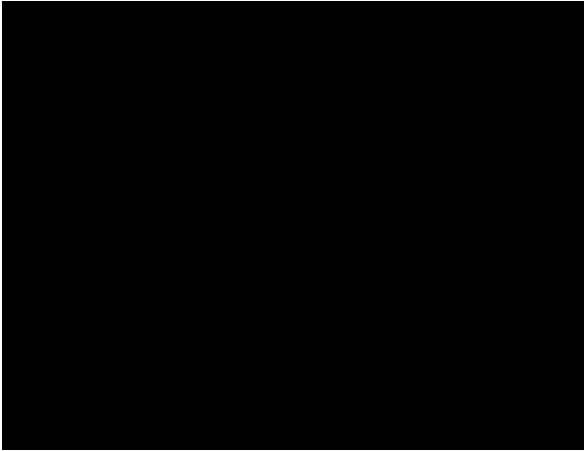
September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	A. Huddleston	1.20	627.30	B110	Conduct and analyze legal research regarding relation back doctrine under California law in order to determine when complaint against additional defendant must be filed.
09/02/20	T. Moyron	1.00	599.25	B110	Analyze matters related to SCAN (.3); correspond with R. Adcock, et al., and analyze settlement proposal re Toyon (.3); confer with D. Eldan re consolidation of appeals (.1); correspond with H. Levy-Biehl, et al. re resolutions (.1); analyze draft ninth omnibus motion to reject and related correspondence (.2).
09/02/20	K.M. Howard	0.20	50.15	B110	Telephone conference with K. Persaud of Hyatt Court Reporters regarding the corrected transcript (.1); email exchange regarding same (.1).
09/02/20	K.M. Howard	0.80	200.60	B110	Analysis of returned notice from the USBC (.1); prepared Debtors' Notice of Change of Mailing Address (.3); prepared email regarding same (.1); email exchange with T. Moyron regarding Notice of Change of Address (.1); reviewed and revised Notice of Change of Address (.2).
09/03/20	T. Moyron	2.80	1,677.90	B110	Analyze board deck (.2); conference call with Board, R. Adcock, BRG, et al. re plan, Marillac, insurance, benefits, etc. (2.0); analyze correspondence regarding dissolutions for certain entities (.4); conference call with R. Adcock, H. Levy-Biehl, M. Garms, et al. re dissolution documents (.2).
09/03/20	K.M. Howard	0.20	50.15	B110	Reviewed emails regarding Hyatt's hearing transcripts (.1); prepared responses thereto (.1).
09/03/20	K.M. Howard	0.20	50.15	B110	Reviewed underlying information and email exchanges regarding hearing transcripts prepared by Hyatt Court Reporting.
09/03/20	J. Kattan	1.20	960.00	B110	Review draft complaint and analyze related issues w/L Harrison.
<b>Subtotal</b>		<b>34.60</b>	<b>15,576.28</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B120 - Asset Analysis and Recovery**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/21/20	C. Montgomery	2.50	2,000.00	B120	
08/26/20	T. Moyron	2.60	1,558.05	B120	
08/29/20	S. Maizel	0.40	320.00	B120	Analyze emails from potential buyer, L. Wall, etc. re Marillac (.2); analyze email from counsel for SCAN (.2); analyze matters related to Cochlear Americas stipulation (.2); analyze K. Wang, et al. emails re claim of Dept. of Public Health (.2); analyze updated liquidating trust agreement and redline (.3); prepare email to H. Grobstein, et al. re same (.1); analyze email from T. Conner re business interruption ins. (.1); analyze matters related to Toyon (.2); analyze matters related to Nant master lease settlement (.2); analyze email from ASK re SmithGroup (.1); analyze email from Committee counsel re response to Court order re SGM (.1); analyze SGM motion for stay re order (.5); analyze emails from H. Levy-Biehl, et al. re Navex/Compliance question (.1); analyze email from T. Conner re NOPHI Prime Collections (.1).
09/02/20	T. Moyron	0.50	299.63	B120	Telephone conference with H. Kevane re SCAN issues.
					Analyze matters related to interrogatories, RFAs and discovery (.3); analyze matters related to motion to dismiss counterclaim (.2).
<b>Subtotal</b>		<b>6.00</b>	<b>4,177.68</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	R. Richards	1.70	1,229.10	B130	Review and forward changes to model Stock Purchase Agreement (0.3) and exhibits and closing documents (0.3), revise and circulate sale motion (0.7) and supporting declarations (0.4).
08/02/20	S. Maizel	0.50	400.00	B130	Telephone conference with R. Adcock, BRG, etc. re sale closing issues.
08/03/20	R. Richards	0.50	361.50	B130	Review and forward revised motion and declarations (0.3); emails re follow up comments (0.2).
08/03/20	S. Maizel	0.50	400.00	B130	Telephone conference with BRG, R. Adcock, etc. re sale closing issues.
08/03/20	C. Montgomery	0.60	480.00	B130	Participate in closing items call.
08/04/20	S. Maizel	1.00	800.00	B130	Telephone conference with Mintz Levin, etc. re sale issues.
08/04/20	T. Moyron	1.80	1,078.65	B130	Analyze open matters related to St. Francis and Seton sales.
08/05/20	T. Moyron	1.20	719.10	B130	Attend to sale closing matters related to St. Francis and Seton.
08/05/20	S. Maizel	0.20	160.00	B130	Telephone conference with R. Adcock, etc. re sale issues.
08/05/20	S. Maizel	0.50	400.00	B130	Revising draft confirmation order.
08/06/20	T. Moyron	0.50	299.63	B130	Conference call with 2005 advisors re status of sale closings and other matters.
08/06/20	T. Moyron	0.30	179.78	B130	Analyze closing statements re AHMC and Prime.
08/06/20	S. Maizel	0.50	400.00	B130	Telephone conference with Mintz, Houlihan, etc. re sales issues.
08/06/20	T. Moyron	3.50	2,097.38	B130	Analyze correspondence from H. Levy-Biehl, et al. re MPT (.3); analyze open matters related to sale, including payroll liability and other APA matters (2.8); correspond and coordinate finalization of schedules and sale issues (.4).
08/07/20	T. Moyron	4.70	2,816.48	B130	Attend to matters related to St. Francis and Seton closings and documents.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	T. Moyron	1.30	779.03	B130	Analyze AG conditions letters (.4); conference call with R. Adcock, et al. (.3); conference call with MWE (.3); follow up conference call with R. Adcock, H. Levy-Biehl re MPT (.3).
08/07/20	C. Montgomery	0.30	240.00	B130	Participate in closing issues call.
08/07/20	S. Maizel	0.50	400.00	B130	Telephone conference with R. Adcock, etc. re sale closing issues.
08/07/20	S. Maizel	0.30	240.00	B130	Telephone conference with BRG, R. Adcock, etc. re internal checklist call.
08/10/20	T. Moyron	2.10	1,258.43	B130	Analyze and prepare comments to LT agreement and analyze plans re administrative expenses (.8); correspond with H. Kevane, et al. re same (.3); analyze notice and attachments (.3); conference call with R. Richards re LT and confirmation order (.3); exchange emails with Ricotta re settlement agreement (.1); see settlement comments (.3).
08/10/20	R. Richards	0.30	216.90	B130	Review new offer and proposed assignment.
08/11/20	S. Maizel	0.20	160.00	B130	Telephone conference with [REDACTED], re closing issues.
08/11/20	T. Moyron	0.20	119.85	B130	Conference call with BRG, Verity, et al. re internal closing checklist call.
08/12/20	T. Moyron	2.20	1,318.35	B130	Attend to matters and documents related to closing St. Francis and Seton.
08/13/20	T. Moyron	0.70	419.48	B130	Analyze matters related to finalization of Nant Master Lease Settlement re bill of sale, order, distributions (.3); prepare correspondence regarding same (.2); analyze P. Saba et al. correspondence re same (.2).
08/13/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, etc. re pending closing of sale issues.
08/13/20	S. Maizel	0.20	160.00	B130	Telephone conference with Andrew Turnbull re closing status.
08/13/20	N. Koffroth	0.30	150.45	B130	Draft order approving NantWorks 9019 motion

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	G. Medina	1.40	410.55	B130	Attend Prime Call re closing (0.5); retrieve and send to Client and additional group all orders entered by the court including confirmation order (0.7); download and send e-file copy to N. Koffroth T. Moyron and S. Maizel (0.2).
08/14/20	G. Medina	0.80	234.60	B130	Call with T. Moyron regarding filings of Notices of Closing of Seton and SFMC (0.2); review and edits to Notices and file accordingly (0.6).
08/14/20	T. Moyron	0.70	419.48	B130	Analyze, prepare and address 9019 motion.
08/14/20	T. Moyron	0.40	239.70	B130	Call with D. Bleck re sale closures and other matters.
08/14/20	T. Moyron	0.40	239.70	B130	Call with P. Chadwick re sale closure matters and other issues.
08/14/20	T. Moyron	0.60	359.55	B130	Analyze and finalize notice of occurrence of closing date re Seton (.2); analyze and finalize notice of occurrence of closing date re St. Francis (.2); analyze H. Kevane prior emails and correspond with H. Kevane re same (.2).
08/17/20	R. Richards	0.20	144.60	B130	Emails re potential bidder diligence requests.
08/24/20	T. Moyron	0.80	479.40	B130	Conference call with H. Kevane, H. Grobstein, BRG, et al. re payor and capitation agreements.
08/24/20	T. Moyron	1.50	898.88	B130	Conference call with R. Adcock, BRG, C. Montgomery re Nant Equipment settlement (.4); analyze JD letters (.2); conference call with R. Adcock re same (.5); analyze matters related to settlement and payments (.3); conference call with P. Saba re same (.1).
08/25/20	S. Martin	0.10	76.08	B130	Review SGM appeal of bankruptcy plan confirmation order.
08/25/20	R. Garms	2.30	1,388.05	B130	Review bylaws in connection with wind-down questions.
08/26/20	C. Montgomery	0.40	320.00	B130	Phone call with F Neufeld regarding subscriptions fee continuation.
08/29/20	R. Garms	1.20	724.20	B130	Review Marillac transaction details.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/20	R. Garms	2.60	1,569.10	B130	Draft resolutions for Marillac sale and bylaw amendments.
09/01/20	R. Garms	2.40	1,448.40	B130	Draft resolutions regarding wind-down activities.
09/01/20	J. DiChiara	5.40	2,317.95	B130	Continue research and analysis of California law with respect to dissolutions of nonprofit public benefit corporations and limited liability companies (2.0); draft and revise documents providing for the dissolution of Verity Holdings, LLC, Verity Business Services, and De Paul Ventures entities (3.0); confer with C. Keyser regarding the same (.4).
09/01/20	R. Richards	0.20	144.60	B130	Emails re bidder status and next steps.
09/02/20	R. Richards	1.40	1,012.20	B130	Review and comments on revised board slides and emails re same (0.4); review revised offer letter (0.2); revise and circulate Stock Purchase Agreement (0.6); review further revised board slides (0.2).
09/02/20	R. Garms	1.70	1,025.95	B130	Revise resolutions.
09/02/20	R. Garms	2.10	1,267.35	B130	Work on dissolution documents.
09/02/20	R. Barbarowicz	1.10	785.40	B130	Review draft of stock purchase agreement.
09/03/20	J. DiChiara	8.60	3,691.55	B130	Review and revise Resolutions of the Board of Verity Health System of California, Inc. appointing Howard Grobstein as President, reconstituting its Board of Directors (4.0); confer with M. Garms regarding the same; draft and revise Board resolutions on behalf of 10 different debtor entities (i) amending their Bylaws, (ii) reconstituting their Boards and (iii) appointing Grobstein as President (4.0); confer with C. Keyser and M. Garms regarding the same (.6).
09/03/20	R. Garms	1.10	663.85	B130	Call regarding dissolution issues (0.3); review dissolution documentation and comment on same (0.8).
09/03/20	R. Garms	2.70	1,629.45	B130	Prepare resolutions in connection with wind-down.
09/04/20	R. Garms	1.10	663.85	B130	Review and provide comments on Marillac purchase agreement.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	J. DiChiara	5.80	2,489.65	B130	Draft and revise authorizing resolutions on behalf of De Paul Ventures, LLC and De Paul Ventures - San Jose Dialysis, LLC reconstituting Board of Managers (3.0); review and revise dissolution consents and filings on behalf of VHS, VBS, Verity Holdings and the De Paul Ventures entities (2.4); confer with C. Keyser and L. Howard regarding the same (.4).
<b>Subtotal</b>		<b>73.90</b>	<b>42,168.20</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	K.M. Howard	0.30	75.23	B140	Reviewed docket to determine if orders granting relief from stay were issued by the court in July 2020 (.2); prepared email to N. Haslun regarding status (.1).
	<b>Subtotal</b>	<b>0.30</b>	<b>75.23</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B150 - Meetings of and Communications with Creditors**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	G. Miller	0.20	88.40	B150	Call with E. Parks re UCC discovery requests.
08/10/20	A. Ruegger	0.70	560.00	B150	Communications with Milbank re document requests (0.1); review file and communications with T. Moyron and Dentons team re Milbank requests (0.6).
08/11/20	A. Ruegger	0.20	160.00	B150	Communications with Milbank re document requests.
08/12/20	A. Ruegger	0.80	640.00	B150	Communications with Dentons team re Milbank request for additional documents (0.5); communications with Milbank re same (0.3).
08/13/20	A. Ruegger	0.60	480.00	B150	Communications with Milbank re document requests.
08/14/20	A. Ruegger	0.70	560.00	B150	Review file on productions to UCC (0.4); communications with Milbank re open requests (0.3).
08/21/20	A. Ruegger	1.70	1,360.00	B150	Review file re Milbank document requests (0.4); communications with T. Moyron re Milbank document requests (0.2); communications with Milbank re document requests (0.3); communications with client re open Milbank document requests (0.2); conference call with Dentons team re potential claims arising from 2015 and 2017 transactions (0.6).
08/26/20	A. Ruegger	0.30	240.00	B150	Communications with Milbank and Dentons team re additional requests for documents.
09/01/20	S. Maizel	0.10	80.00	B150	Review and respond to emails with Ken Wang re payments.
<b>Subtotal</b>		<b>5.30</b>	<b>4,168.40</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B160 - Fee/Employment Applications**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	J.A. Moe, II	0.10	59.93	B160	/BZBM/ Exchange E-Mails with Kerry Duffy on the submitting on Tentative Ruling, and telephone call on preparing Order and request for four amounts from Ms. Duffy for the BZBM part of the Order.
08/04/20	J.A. Moe, II	0.20	119.85	B160	/Dentons Fifth Interim Fee Application/ Review Judge's Robles' Tentative Ruling on Fee Applications, telephone call to Daniel Koontz submitting on the Tentative Ruling on Dentons' Application, and identify form of Order to prepare Order on fees and expenses awarded to four Professionals.
08/05/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' July Monthly Fee Application/ Review Katherine Smith's E-Mail on first set of Statements for review and revision, and exchange E-Mails with Kathryn Howard on review of internal calculations of time.
08/06/20	K.M. Howard	3.80	952.85	B160	Reviewed Dentons' billing statements for June 2020 for privilege and redacted areas designated as privileged.
08/06/20	J.A. Moe, II	0.90	539.33	B160	/Fifth Interim Fee Applications/ In regard to preparing the Order on the Fee Applications, identify and assemble documents related to the seven Fee Applications (.40); prepare first draft (with fees to be inserted) of the Order awarding fees and expenses to seven law firms (.20); determine amount awarded and remaining due for each Applicant (.30).
08/07/20	K.M. Howard	0.20	50.15	B160	Reviewed emails from James Behrens regarding 20% hold back and verified same.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	J.A. Moe, II	0.90	539.33	B160	/Fifth Interim Fee Applications/ Review draft Order on fees and expenses, and direction on completing draft with amounts awarded (.10); telephone call to James Behrens on amount of reserve due and payable to FTI (.10); confer on formatting the Order and use of parentheticals (.10); exchange E-Mails with James Behrens on amount due FTI (.10); review and revise the first draft of the proposed Order (.30); review and revise second draft of the proposed Order (.20).
08/09/20	J.A. Moe, II	0.40	239.70	B160	/Fifth Interim Fee Applications/ Review revised draft Order on award of fees and expenses (.10); exchange E-Mails with James Behrens, Peter Chadwick, Kerry Duffy and Tom Geher on review and approval of Order on fees and expenses (.30).
08/10/20	J.A. Moe, II	1.30	779.03	B160	/Fifth Interim Fee Applications/ Exchange E-Mails with James Behrens, Kerry Duffy and Megan Havencamp, and telephone call with Ms. Duffy, on minor revisions to the proposed Order on fees and expenses (.30), revise the Order through three sets of minor revisions (.60); review and identify each of the Tentative Rulings on each of the seven Fee Applications and include references to those Rulings in the Order (.20), make two revisions to the Order, then send for review to Mr. Behrens and to Ms. Duffy and Ms. Havencamp (.20).
08/11/20	J.A. Moe, II	0.30	179.78	B160	/Dentons' May Monthly Fee Application/ In response to Tania Moyron's request, review May Application, then telephone call to and exchange E-Mails with Peter Chadwick on payment of fees and expenses to Dentons.
08/11/20	J.A. Moe, II	2.10	1,258.43	B160	/Dentons July Monthly Fee Application/ Commence review and first set of revisions to the July Statements, including review and revisions to the Statements for Submatters 4, 5, 7, 10, 15, 12, 14, 16 19 and 21, and the Expense Statement (1.20); review first draft of and revise Statement on Submatter No . 8 (.40); review first draft of and revise Statements on Submatter No 6 (.50).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	K.M. Howard	1.90	476.43	B160	Analysis of Dentons' billing statements for June 2020 and prepared summary of hours and fees for each timekeeper.
08/12/20	J.A. Moe, II	1.40	838.95	B160	/Dentons July Monthly Fee Application/ Continue to review first draft of the July Statements, reviewing and revising pages 1 through 65 of the Statements on Submatter 3, in compliance with US Trustee Guidelines.
08/12/20	K.M. Howard	1.80	451.35	B160	Reviewed Dentons' June 2020 billing statements and prepared spreadsheet and summary of hours, fees and expenses by Debtor.
08/12/20	K.M. Howard	0.30	75.23	B160	Reviewed email chain regarding Denton's monthly fee applications (.1); reviewed same and determine allocations (.1); prepared response (.1).
08/13/20	J.A. Moe, II	3.00	1,797.75	B160	/Dentons July Monthly Fee Application/ Continue to review Statements, reviewing and revising pages 65 through 119 of Statements on Submatter Number 3 (1.20); review and revise Statements on Submatter No. 21 (.60); review all Statements for revision and transmit for revision (1.20).
08/13/20	K.M. Howard	3.60	902.70	B160	Reviewed spreadsheet and prepared Dentons' Monthly Fee Application for June 2020 (.9); reviewed and revised Monthly Fee Application for June 2020 (.4); reviewed and finalized summary of hours and fees by timekeeper (.2); reviewed and finalized summary of hours, fees and costs by debtor (.2); further analysis of billing statements for privilege and redacted privileged entries (1.4); assembled fee application and exhibits thereto and organized (.4); prepared email to S. Maizel and T. Moyron (.1).
08/14/20	J.A. Moe, II	0.50	299.63	B160	/Dentons June Monthly Fee Application/ In response to Sam Maizel's E-Mail, review June Statements and calculate fees and costs due Dentons (.30); exchange E-Mail with Kathryn Howard and E-Mail to Sam Maizel on amount of fees and costs due Dentons (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	T. Moyron	0.20	119.85	B160	Call with J. Moloney re [REDACTED]
08/14/20	S. Maizel	0.20	160.00	B160	Telephone conference with T. Moyron re [REDACTED]
08/14/20	K.M. Howard	0.20	50.15	B160	Reviewed the order approving payment of interim fee to professionals (.1); prepared email to S. Maizel (.1).
08/15/20	T. Moyron	0.50	299.63	B160	Conference call with C. Montgomery and S. Maizel re [REDACTED].
08/15/20	C. Montgomery	0.70	560.00	B160	Phone conference with T Moyron and S Maizel re [REDACTED].
08/15/20	S. Maizel	0.40	320.00	B160	Telephone conference with T. Moyron, etc. re [REDACTED].
08/17/20	S. Maizel	0.50	400.00	B160	Telephone conference with Cain re fees.
08/17/20	J.A. Moe, II	0.10	59.93	B160	/Fifth Interim Fee Applications/ Review Certificate of Distribution on Order awarding fees and costs to seven Professionals.
08/19/20	K.M. Howard	0.30	75.23	B160	Reviewed email from A. Bruscella regarding interim fee application for January - April 2020 (.1); reviewed same, culled requested information (.1); prepared responsive email to A. Bruscella regarding the remaining amount owed during the interim period (.1).
08/20/20	M. Zeefe	0.80	384.20	B160	Review T. Moyron email [REDACTED] [REDACTED]
08/20/20	K.M. Howard	0.40	100.30	B160	Analysis of email regarding filing of final fee applications (.1); reviewed and revised Critical Dates Memorandum regarding the targeted effective date of the plan (.3).
08/20/20	J.A. Moe, II	0.80	479.40	B160	/Final Fee Applications/ Review and respond to Tania Moyron's E-Mail on Final Fee Applications, and prepare draft of Notice Of Final Fee Applications on when they are due and when they will be considered (.40); review prior form of Notice and create a second Notice (.20); review and revise the draft of the second Notice (.20);



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/21/20	J.A. Moe, II	0.10	59.93	B160	/Final Fee Applications/ Review and make one revision to the current draft of the Notice on the filing and hearing date of Final Fee Applications, also conferring briefly with Tania Moyron on dates.
08/21/20	T. Moyron	1.40	838.95	B160	Call with R. Adcock and S. Maizel re Cain, fee, final fee application (.7); call with J. Moloney and S. Maizel re same (.3); call Rich Adcock (.2); call with S. Maizel re same (.2).
08/21/20	K.M. Howard	0.30	75.23	B160	Received, organized and briefly reviewed Dentons' billing statements for July in conjunction with reviewing same for US Trustee compliance.
08/23/20	J.A. Moe, II	1.10	659.18	B160	/Dentons July Monthly Fee Application/ Review and make second set of revisions in compliance with U.S. Trustee Guidelines, to the set of Statements containing the first set of revisions, including the Statements on Submatters, 5, 7, 10, 12, 15, 19, 20 and 21, and the Expense Statements (.70); review and revise first draft of the Statements on Submatter 6 (.40);
08/24/20	J.A. Moe, II	0.90	539.33	B160	/Dentons' July Monthly Fee Application/ Continue to review the second draft of the Statements, and review and revise Statements on Submatter No. 6, in compliance with the U.S. Trustee Guidelines (.90);
08/24/20	K.M. Howard	4.10	1,028.08	B160	Analysis of Dentons' billing statements for July 2020 and revised same to bring into compliance with U.S. Trustee Guidelines.
08/25/20	K.M. Howard	0.30	75.23	B160	Telephone conference with J. Moe regarding June fees and costs (.1); reviewed June Monthly Fee Applications and culled requested information (.1); prepared email to J. Moe (.1).
08/25/20	K.M. Howard	0.90	225.68	B160	Analysis of Dentons July billing statements and revised same to bring into compliance with U.S. Trustee Guidelines.
08/25/20	C. Montgomery	0.20	160.00	B160	Phone calls with T Moyron and D Galfus regarding [REDACTED].

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	J.A. Moe, II	1.80	1,078.65	B160	/Dentons July Monthly Fee Application/ Continue review of second draft of the revised Statements, reviewing and revising Statements on Submatter 3 in compliance with U.S.Trustee Guidelines
08/25/20	J.A. Moe, II	0.40	239.70	B160	In regard to establishing reserves for the Plan: Review John Schlant's Memorandum on estimated Professional Fees, then review fees and expenses for Dentons for July and exchange E-Mails with Tania Moyron and amount (.20); exchange E- Mails with Tania Moyron on Dentons June Fees, reviewing fees and expenses for June and return E-Mail on amount for June, 2020 (.20).
08/26/20	J.A. Moe, II	0.40	239.70	B160	/Professionals' July Monthly Billing Statements/ Exchange E-Mails with Kathryn Howard on review of internal calculations on individual time entries (.10); telephone call to Katherine Smith on the completion of the Statements (.10); telephone call with Kathryn Howard on responding to, and exchange E-Mails with Bob Richards on completing the July Fee Application (.20).
08/26/20	J.A. Moe, II	0.40	239.70	B160	/ASK LLP/ Prepare Declaration That No Party Requested A Hearing On Motion, and prepare draft Order on employment of ASK LLP.
08/26/20	K.M. Howard	3.80	952.85	B160	Analysis of Dentons' July billing statements, revised same to bring into compliance with U.S. Trustee Guidelines (3.7); conferred with J. Moe regarding same (.1).
08/26/20	K.M. Howard	0.10	25.08	B160	Email exchange with N. Neves of Davis Wright regarding their monthly fee application.
08/27/20	J.A. Moe, II	0.70	419.48	B160	/Dentons' July Monthly Fee Application/ Review and prepare revised two sets of Statements for revisions, as prepared by John Moe and by Kathryn Howard (.60); telephone call to Katherine Smith on transmittal to Ms. Smith (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	J.A. Moe, II	0.40	239.70	B160	/ASK LLP/ Exchange E-Mails with Tania Moyron on the Declaration and Order on the employment of ASK LLP (.10); minor revisions to the Declaration and revise and expand the Order (.20); review the completed Declaration and Order (.10).
08/27/20	J.A. Moe, II	0.20	119.85	B160	/Final Fee Applications/ Revise Notice on Final Fee Applications.
08/27/20	J.A. Moe, II	0.10	59.93	B160	/Dentons' Final Fee Application/ Commence review of and consideration of the Format for the Final Fee Application.
08/28/20	J.A. Moe, II	0.10	59.93	B160	/BZBM/ In regard to the Bartko Monthly Fee Application for July, review with Kerry Duffy the Fee Application.
08/28/20	J.A. Moe, II	1.70	1,018.73	B160	/Dentons July Monthly Fee Application/ Review E-Mail and text from Katherine Smith on Statement for Seton, and consider steps to reconcile issues (.10); review July Statements (.30); review third draft of the Statement on Submatter No 8, revising the Statement to comply with the U.S. Trustee Guidelines, then transmit to Ms. Smith for revision (1.30).
08/29/20	J.A. Moe, II	0.90	539.33	B160	/Dentons' Monthly Statements/ Review, assemble, integrate and organize drafts and final versions of Dentons' Statements for June, July and August, 2020.
08/31/20	J.A. Moe, II	0.50	299.63	B160	/Dentons' July Monthly Fee Application/ Telephone call to Katherine Smith on further revisions to the Seton Statements (.10); review and transmit the third set of revisions of the Seton Statements for revision (.40).
08/31/20	N. Koffroth	0.50	250.75	B160	Analysis of professional compensation issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	K.M. Howard	1.10	275.83	B160	Email exchanges with Laurie Miskowiec regarding pro hac vice admissions of ASK counsel in avoidance actions (.1); reviewed and revised pro hac vice admissions of Bridgett McGrath (.2), Gary Underdahl (.1) and Nicholas Brown (.1); reviewed and finalized orders (x3) related to each application (.3); telephone conferences regarding the payment of the fees at USDC, filling of applications and orders (.2); email exchanges with T. Moyron regarding same (.1); email exchange with Andres Estrada of KCC regarding service of same (.1).
09/01/20	S. Maizel	0.50	400.00	B160	Telephone conference with R. Adcock, etc. re Cain and Houlihan fees.
09/01/20	J.A. Moe, II	1.10	659.18	B160	/Dentons July Monthly Fee Application/ Review final set of July Statements, and forward for internal review.
09/03/20	J.A. Moe, II	0.20	119.85	B160	/Dentons' August/September Monthly Fee Application/ Preliminarily review Dentons' August Statements and telephone call with Katherine Smith on including first part of September in the final Monthly Application.
09/03/20	J.A. Moe, II	1.00	599.25	B160	/August Monthly Fee Application/ Telephone call from Tania Moyron on last monthly fee application, and respond to E-Mail on such Application (.10); telephone calls with James Behrens, Kerry Duffy David Galfus and Henry Kevane on August Fee Applications and projected date for the Final Fee Applications (90).
09/03/20	J.A. Moe, II	0.10	59.93	B160	/Milbank/ Review Supplemental Declaration Of Mark Shinderman in regard to the retention of Milbank as the Creditors' Committees' Counsel, in regard to Milbank's relationship with Blue Mountain.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	J.A. Moe, II	4.40	2,636.70	B160	Dentons August/September Monthly Fee Application/ Review and revise first draft of the Statements for Submatters 4, 5, 9, 10, 11, 14, 15 and 21, and the Expense Statement (.60); review and revise first draft of the Statements on Submatter No. 20, including transmitting pages to be revised to Jae Park (60); review and revise first draft of the Statements on Submatter No. 8 (.30); review and revise first draft of the Statements on Submatter No. 6 (.80); review and revise the first draft of the Statements on Submatter No 3, including identifying and transmitting four descriptions to Taylor Koshak for revisions (2.10).
<b>Subtotal</b>		<b>57.60</b>	<b>26,824.40</b>		
<b>Less Discount to Client</b>			<b>(12,965.00)</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B180 - Avoidance Action Analysis**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	J.A. Moe, II	0.10	59.93	B180	Telephone call with An Ruda, Elina Tilman and Karleen Murphy on preference recovery process.
08/09/20	J.A. Moe, II	0.40	239.70	B180	In response to Tania Moyron's request, commence search and review of Ordinary Course Professionals, and whether they should be the subject of a preference recovery (.20); exchange E-Mails with Bridgette MCGehrin on List (.10); review E-Mail on resolution of issues (.10).
08/13/20	J.A. Moe, II	0.10	59.93	B180	/West Com - TV Inc./ Review multiple E-Mails on proposed settlement of preference action.
08/17/20	C. Montgomery	1.00	800.00	B180	Phone conference with T Moyron, S Maizel, M Zeefe, A Ruegger, N Koffroth re open avoidance questions (.5); phone conference with M Shinderman, T Moyron , regarding committee avoidance actions (.5)
08/17/20	T. Moyron	1.50	898.88	B180	
08/17/20	J.A. Moe, II	0.10	59.93	B180	Review E-Mails from Mark Shinderman and Krista Waters on Withdrawal Of Claims with respect to Dr. S Pourrabani.
08/17/20	M. Zeefe	0.50	240.13	B180	Call re potential avoidance actions.
08/17/20	A. Ruegger	1.00	800.00	B180	Conference call with Dentons team to discuss potential avoidance claims (0.5); review source documents re 2015 transaction (0.5).
08/19/20	C. Montgomery	1.80	1,440.00	B180	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task
08/20/20	C. Montgomery	3.50	2,800.00	B180
08/21/20	S. Maizel	1.10	880.00	B180
08/21/20	L. Harrison	3.00	2,400.00	B180
08/21/20	L. Whidden	5.30	4,057.15	B180
08/21/20	T. Moyron	1.10	659.18	B180
08/22/20	C. Montgomery	0.50	400.00	B180
08/22/20	L. Harrison	5.80	4,640.00	B180

Narrative

[REDACTED]

[REDACTED]

[REDACTED]

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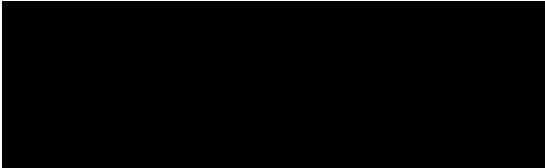

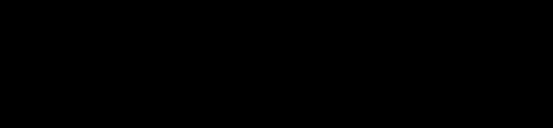
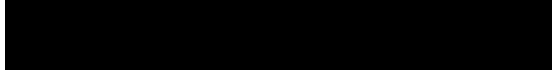

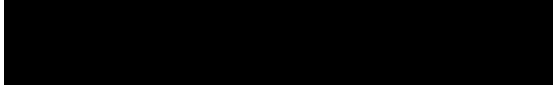

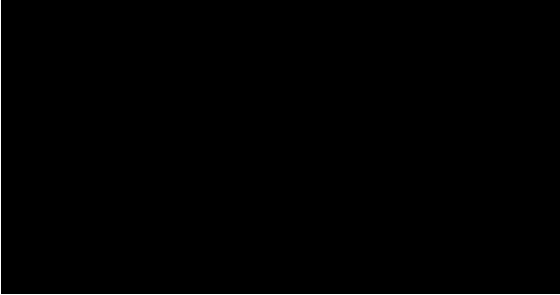
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656




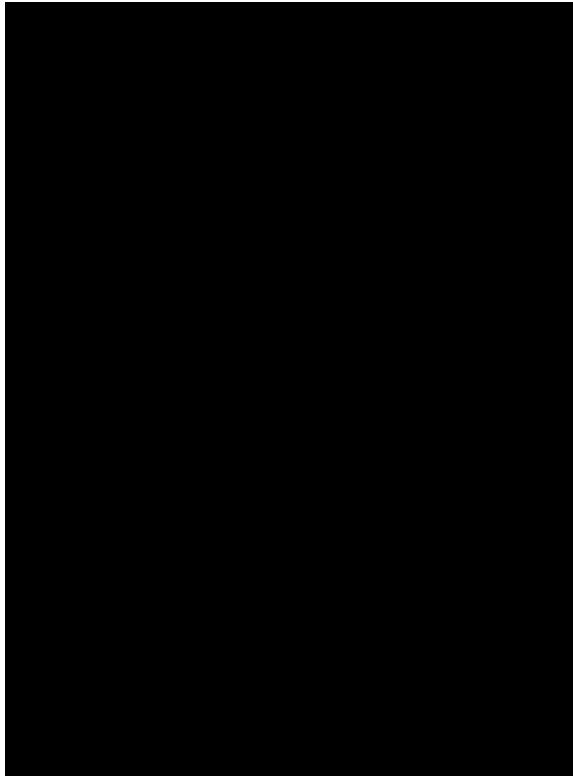
September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/22/20	L. Whidden	4.10	3,138.55	B180	
08/23/20	L. Whidden	2.60	1,990.30	B180	
08/23/20	L. Harrison	6.00	4,800.00	B180	
08/23/20	C. Montgomery	0.40	320.00	B180	
08/24/20	S. Maizel	0.70	560.00	B180	
08/24/20	D. Cook	0.20	94.35	B180	
08/24/20	C. Montgomery	2.50	2,000.00	B180	
08/24/20	L. Harrison	5.50	4,400.00	B180	



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	A. Ruegger	1.80	1,440.00	B180	
08/25/20	A. Ruegger	0.70	560.00	B180	
08/25/20	C. Montgomery	1.00	800.00	B180	
08/25/20	L. Whidden	9.50	7,272.25	B180	
08/25/20	N. Koffroth	0.80	401.20	B180	Draft form preference complaint

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

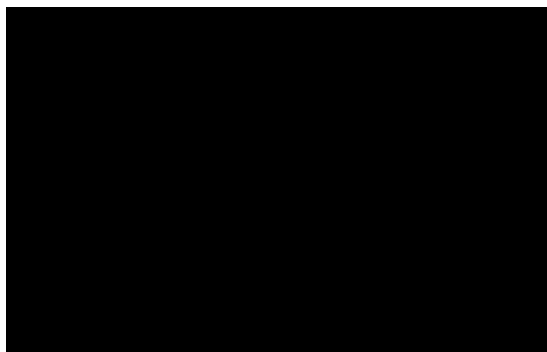
Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	D. Cook	4.60	2,170.10	B180	
08/25/20	S. Maizel	0.80	640.00	B180	
08/25/20	L. Harrison	6.20	4,960.00	B180	
08/26/20	K.M. Howard	0.10	25.08	B180	Analysis of order approving stipulation granting leave, standing and authority of the UCC to investigate and prosecute causes of action related to Integrity Healthcare to determine additional deadline or requirements set by the court.
08/26/20	L. Whidden	7.30	5,588.15	B180	
08/26/20	L. Harrison	8.80	7,040.00	B180	
08/26/20	T. Moyron	1.30	779.03	B180	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task
08/26/20	C. Montgomery	1.50	1,200.00	B180

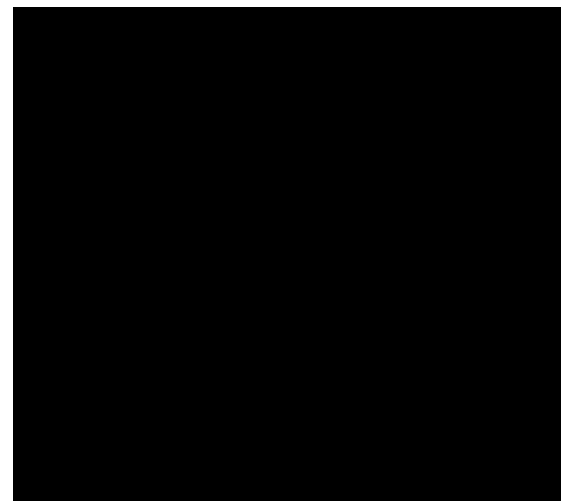
Narrative



08/26/20	D. Cook	4.10	1,934.22	B180
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08/27/20	L. Whidden	9.10	6,966.05	B180
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08/27/20	T. Moyron	3.30	1,977.53	B180
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08/27/20	T. Moyron	0.20	119.85	B180
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
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08/27/20	C. Montgomery	4.80	3,840.00	B180	
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08/27/20	S. Maizel	2.10	1,680.00	B180	
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08/27/20	S. Maizel	1.00	800.00	B180	
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08/27/20	L. Harrison	11.60	9,280.00	B180	
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08/27/20	D. Cook	2.20	1,037.87	B180	
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	J.A. Moe, II	0.10	59.93	B180	Telephone call from Gary Torrell of Hooper Lundy & Bookman, on representing Defendants, and E-Mail to Sam Maizel and Tania Moyron on Mr. Torrell's request.
08/28/20	L. Harrison	11.80	9,440.00	B180	
08/28/20	D. Cook	1.20	566.11	B180	
08/28/20	C. Montgomery	1.60	1,280.00	B180	
08/28/20	S. Maizel	0.60	480.00	B180	
08/28/20	S. Maizel	0.30	240.00	B180	Telephone conference with Counsel for BlueMountain re tolling agreement issues.
08/28/20	S. Maizel	0.20	160.00	B180	
08/28/20	S. Maizel	0.40	320.00	B180	
08/28/20	N. Koffroth	1.50	752.25	B180	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
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08/28/20	L. Whidden	3.70	2,832.35	B180	
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08/29/20	T. Moyron	1.90	1,138.58	B180	
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08/29/20	S. Maizel	2.40	1,920.00	B180	
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08/29/20	C. Montgomery	0.80	640.00	B180	
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08/29/20	L. Harrison	11.30	9,040.00	B180	
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08/29/20	M. Zeefe	6.80	3,265.70	B180	
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
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08/30/20	L. Harrison	12.20	9,760.00	B180	
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08/30/20	C. Montgomery	0.80	640.00	B180	
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08/30/20	M. Zeefe	4.70	2,257.18	B180	
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08/30/20	S. Maizel	0.20	160.00	B180	
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08/30/20	T. Moyron	0.20	119.85	B180	
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08/30/20	T. Moyron	1.30	779.03	B180	
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08/31/20	N. Koffroth	3.40	1,705.10	B180	
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
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08/31/20	C. Montgomery	1.70	1,360.00	B180	
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08/31/20	J. Kattan	0.80	640.00	B180	
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08/31/20	L. Whidden	3.30	2,526.15	B180	
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08/31/20	L. Harrison	13.50	10,800.00	B180	
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					
08/31/20	M. Zeefe	5.40	2,593.35	B180	
08/31/20	D. Cook	3.60	1,698.34	B180	
08/31/20	K.M. Howard	1.00	250.75	B180	Reviewed and culled complaints, issued summons and amended complaints in avoidance actions and organized same in conjunction with preparing case tracking charts.
08/31/20	K.M. Howard	0.40	100.30	B180	Analysis of the Stipulation Approving Tolling Agreement between Debtors and Blue Mountain Capital and reviewed and revised Critical Dates Memorandum.
08/31/20	T. Moyron	0.30	179.78	B180	Analyze ASK complaint and issues and prepare emails regarding same.
08/31/20	T. Moyron	0.30	179.78	B180	Prepare correspondence regarding dismissal of preference complaint against secured creditor McKesson (.2); call with ASK re same (.1).
08/31/20	T. Moyron	0.80	479.40	B180	
09/01/20	C. Montgomery	0.80	640.00	B180	

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	L. Harrison	5.90	4,720.00	B180	
09/01/20	M. Zeefe	4.80	2,305.20	B180	
09/01/20	S. Maizel	0.30	240.00	B180	
09/02/20	L. Harrison	4.00	3,200.00	B180	
09/02/20	L. Whidden	1.10	842.05	B180	
09/03/20	L. Harrison	3.80	3,040.00	B180	
09/03/20	K.M. Howard	0.30	75.23	B180	Analysis of emails from S. Delgado and the USDC Clerk regarding the status of the pro hac vice applications and payment of fees including telephone conference (.2); prepared email to T. Moyron regarding status (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	L. Harrison	4.90	3,920.00	B180	

09/04/20	M. Zeefe	0.20	96.05	B180	
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<b>Subtotal</b>		<b>256.20</b>	<b>185,691.82</b>		
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Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	C. Doherty, Jr.	0.10	37.40	B185	Prepare Order for Seventh Rejection Motion
08/04/20	S. Maizel	0.40	320.00	B185	Telephone conference with H. Kevane, etc. re payor contracts
08/09/20	G. Medina	5.80	1,700.85	B185	Communication with N. Koffroth re assistance with filings (0.2); review and monitor email related to workstream (0.4); reviewed emails and communications related to Sixth Rejection motion (0.3); Assist with the review, preparation and filing of numerous pleadings (4.6); Numerous calls with T. Moyron re filings and the sixth omnibus rejection motion (0.3);
08/11/20	K.M. Howard	0.60	150.45	B185	Analysis of tentative ruling regarding Debtors' Sixth Omnibus Motion to Reject Certain Executory Leases and Unexpired Leases and reviewed and revised Critical Dates Memorandum.
08/13/20	K.M. Howard	0.30	75.23	B185	Analysis of amended tentative ruling to Debtors' Motion to Reject Lease or Executory Contract to determine additional requirements and deadlines set by the court and cross-referenced to the Critical Dates Memorandum.
08/31/20	N. Koffroth	0.60	300.90	B185	Analysis of requests from creditors re return of equipment under rejected leases
09/03/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Notice of Motion and Tenth Omnibus Motion to Reject Certain Transition Executory Contracts and Unexpired Leases and reviewed and revised Critical Dates Memorandum.
09/03/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Notice of Motion and Ninth Omnibus Motion to Reject Certain Transition Executory Contracts and Unexpired Leases and reviewed and revised Critical Dates Memorandum.
<b>Subtotal</b>		<b>8.60</b>	<b>2,785.43</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	K. Murphy	0.30	124.95	B190	/ CT Corporation-Sherly Walker / Analyze notice from CT Corporation re service of letter re overdue production of documents per subpoena for medical records and download, acknowledge, and review document (.1); analyze prior email to Verity Team enclosing original subpoena (.1); and draft email to Karen Chapman re overdue production (.1). .
08/03/20	J.A. Moe, II	0.10	59.93	B190	/Mike Fayfel v. Verity/ Review decision of Insurer on insurance, reviewing Karen Chapman's, Elina Tilman's and Karleen Murphy's E-Mails on coverage and next steps.
08/03/20	K. Murphy	0.20	83.30	B190	/ Fayfel / Analyze email from Elina Tilman enclosing AIG coverage letter and analyze letter (.1); and prepare update to Verity Chart (.1).
08/04/20	K. Murphy	0.30	124.95	B190	/CT Corp - Lopez / Analyze CT Corp Notice of medical billing record subpoena and download document (.1); analyze billing record subpoena to San Jose Medical Group (.1); and prepare email to Verity Team re the same (.1).
08/04/20	K. Murphy	0.40	166.60	B190	/CT Corp - Lopez / Analyze two CT Corp Notices of medical billing record subpoenas and download documents (.1); analyze two billing records subpoenas to two different San Jose Medical Group facilities (.2); and prepare emails to Verity Team re the same (.1).
08/04/20	K. Murphy	0.30	124.95	B190	/CT Corp - Lopez / Analyze CT Corp Notice of medical record subpoena re Dr. Rita Khodosh at Verity Health on Lincoln Ave, San Jose and download document (.1); analyze subpoena (.1); and prepare emails to Verity Team re the same (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	K. Murphy	0.30	124.95	B190	/CT Corp - Lopez / Analyze CT Corp Notice of medical record subpoena re treatment of Dr. Sundaramurthy at San Jose Medical Center on Samaritan Drive, San Jose, and download document (.1); analyze subpoena (.1); and prepare emails to Verity Team re the same (.1).
08/07/20	K. Murphy	0.10	41.65	B190	/ CT Corp - Bermudez / Analyze CT Corp notice of subpoena and email from Elina Tilman to Verity Team enclosing the same.
08/11/20	K. Murphy	0.20	83.30	B190	/ CT Corp - Walker/ Analyze CT Corp notice of subpoena, and download and analyze the same (.1); and draft email to Verity Team re the same (.1).
08/11/20	D. Pina	0.20	63.75	B190	Communications regarding potential filing related to Cigna Hospital Services Agreement.
08/13/20	K. Murphy	0.60	249.90	B190	/ Webb / Analyze emails from Elina Tilman enclosing new DFEH Complaint and DFEH letter responding to Complaint and Notice of Right to Sue (.1); prepare updates to Verity Charts re same (.3); analyze further emails from Elina Tilman re tender letter to Kforce (.1); and prepared further updates re insurance coverage reporting date and tender letter (.1).
08/13/20	K. Murphy	0.50	208.25	B190	/ Peter Evanciew / Analyze EEOC and DFEH charge for discrimination and response advising of Right to Sue Letter (.1); analyze emails from Elina Tilman re insurance coverage issue (.1); and prepare updates to Verity Litigation Management Charts with case summary (.3).
08/14/20	J.A. Moe, II	0.10	59.93	B190	/Peter Evanciew v. Verity/ Review Elina Tilman's E-Mail on, and review accompanying letter from AIG on decision on insurance coverage,

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	J.A. Moe, II	0.20	119.85	B190	Telephone call with Karleen Murphy on updating the "Master Chart" on threatened or actual Litigation (six new cases as to St. Francis and three new cases as to Seton), and review the "Litigation Management Chart" to include the Bathenia Watson matter (.10); second telephone call for Karleen Murphy on settlement of the Carcamo matter(.10).
08/17/20	J.A. Moe, II	0.10	59.93	B190	/Ramona Webb v. Verity/ Review newly received charge of discrimination asserted by Ms. Webb; and exchange E-Mails with Karleen Murphy on new charge.
08/18/20	J.A. Moe, II	0.10	59.93	B190	/Peter Evenciew v. Verity/ Review Elina Tilman's and Karleen Murphy's E-Mails on prepetition nature of assertions.
08/19/20	J.A. Moe, II	0.10	59.93	B190	/Waheed Wahidi v. Verity/ In response to request from Elina Tilman, E-Mail to Claude Montgomery on impact of the Plan on Wahidi matter, and review Tania Moyron's response.
08/19/20	J.A. Moe, II	0.10	59.93	B190	In regard to potential claims, confer with Karleen Murphy on continuing work on updating and producing Chart on pending Litigation.
08/19/20	J.A. Moe, II	0.10	59.93	B190	In regard to the status of pending Litigation in connection with the confirmed Plan, exchange E-Mails with Tania Moyron and telephone call from Sam Maizel on post Effective Date status of cases.
08/20/20	D. Pina	0.70	223.13	B190	Assist A. Ruegger with forms of Joint Defense and Common Interest Agreements.
08/21/20	K. Murphy	0.10	41.65	B190	Confer with John Moe re prior versions of APA Exhibits with listing of labor grievances.
08/24/20	K. Murphy	0.10	41.65	B190	Analyze multiple emails from Karen Chapman, Nam Nguyen, and Richard Adcock re D&O Liability Program-Extension Endorsements.
08/24/20	S. Maizel	0.10	80.00	B190	Review and respond to emails re mediator for HPN mediation.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	J.A. Moe, II	0.10	59.93	B190	Telephone calls with Karleen Murphy on updating the "Master Chart" on litigation and "claims."
08/28/20	G. Medina	3.30	967.73	B190	Call with C. Montgomery regarding Adversary Complaints filed and walk through storage and organization of complaints (0.3); Download and organize at the request of C. Montgomery new Adversary Complaints filed by B. McGrath to avoid transfers and disallow complaints (3.0).
08/28/20	J.A. Moe, II	0.30	179.78	B190	In regard to the analysis of litigation and claims, commence review of litigation and "claims" Charts, reviewing and conferring with Karleen Murphy on "Relief From Stay Chart."
08/28/20	K. Murphy	0.50	208.25	B190	Analyze and review Upcoming Deadline/Conference Chart for all September conferences to ensure calendaring of the same and prepare chart updates.
08/28/20	K. Murphy	3.00	1,249.50	B190	Prepared further updates to all Verity Litigation Management Charts to finalize charts following approval of Bankruptcy Plan and effective date (Relief from Stay, Litigation Management Excel Chart and Word Version, and Deadline Chart).
09/03/20	J.A. Moe, II	0.10	59.93	B190	/Mesha Sanford v. Verity/ Telephone call with Kerry Duffy on BZBM filing Answer on behalf of personal Defendant.
09/03/20	N. Koffroth	0.40	200.60	B190	Draft notices of dismissal re adversary proceedings
<b>Subtotal</b>		<b>13.00</b>	<b>5,248.06</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B200 - Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	J.A. Moe, II	0.30	179.78	B200	/Records/ Review Jae Park's and Tania Moyron's E-Mails on records retention and destruction, and E-Mail to Bob Richards and Ms. Moyron on the amount (.20); telephone call with Bob Richards and exchange E-Mails on impact of resolution of GRM issues (.10).
	<b>Subtotal</b>	<b>0.30</b>	<b>179.78</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B210 - Business Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	J.A. Moe, II	0.10	59.93	B210	/Becton Dickinson/ Review with Jon Emerson the issues arising with Becton Dickinson and return of equipment, and exchange E-Mails with Tania Moyron on closing of sales.
08/14/20	J.A. Moe, II	0.20	119.85	B210	/Dell Financial/ Second return telephone call to and return call from Charles Simpson at Dell Financial, in response to request of Shirley Cho, on monthly payment due Dell.
08/19/20	G. Medina	0.30	87.98	B210	Pull and send to A. Ruegger unaudited 2016 Financial Statements for Verity.
09/03/20	S. Maizel	0.50	400.00	B210	Review and respond to emails re SCAN failure to pay capitation for August.
09/03/20	S. Maizel	0.50	400.00	B210	Telephone conference with R. Adcock, etc. re dissolution issues.
09/04/20	S. Maizel	0.40	320.00	B210	Review and respond to emails re SCAN failure to pay capitation for August.
<b>Subtotal</b>		<b>2.00</b>	<b>1,387.76</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	M. Zeefe	0.10	48.03	B220	Emails re lodgement of PBGC settlement order.
08/03/20	M. Zeefe	0.30	144.08	B220	Revise and coordinate lodging of PBGC settlement order.
08/05/20	K.M. Howard	0.20	50.15	B220	Analysis of the ruling in Debtors' Amended Motion to Reject Local 39 Pension and Trust Agreements to determine related deadlines set by the court.
08/05/20	K.M. Howard	0.20	50.15	B220	Analysis of ruling granting Debtors Motion to Reject Trust Agreement for the Retirement Plan for Hospital Employees to ascertain related deadlines set by the court.
08/10/20	M. Zeefe	0.30	144.08	B220	Revise RPHE trust agreement rejection order.
08/10/20	S. Alberts	0.40	320.00	B220	Receive inquiry on any open pension and union issues and respond (.3) and follow up (.1).
08/11/20	S. Alberts	0.40	320.00	B220	Receive, review and provide comment to proposed for of RPHE rejection order (.3) and follow up (.1).
08/11/20	C. Montgomery	0.60	480.00	B220	Communications with S Alberts regarding rejection of RPHE Trust Agreement (.5); communications with T Moyron re same (.1)
08/11/20	M. Zeefe	1.30	624.33	B220	Revise and finalize RPHE trust agreement rejection order for lodging (0.4); draft and finalize Local 39 trust agreement rejection order for lodging (0.6); call with B. Littell re RPHE withdrawal (0.1); emails re same (0.2).
08/13/20	M. Zeefe	1.20	576.30	B220	Draft letter re automatic withdrawal from RPHE (1.0); emails re same (0.2).
08/14/20	M. Zeefe	0.70	336.18	B220	Revise letter re RPHE automatic withdrawal.
08/14/20	C. Doherty, Jr.	0.10	37.40	B220	Attention to and respond to emails re union matters

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/15/20	M. Zeefe	0.80	384.20	B220	Finalize and send letter re RPHE automatic withdrawal (0.3); call and emails with T. Moyron re same (0.5).
08/26/20	S. Alberts	0.80	640.00	B220	Conference with working group about RPHE issues (.5) and follow up (.3).
08/27/20	S. Alberts	0.40	320.00	B220	Receive and respond to inquiry concerning status of pension claims (.3) and follow up (.1).
	<b>Subtotal</b>	<b>7.80</b>	<b>4,474.90</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B230 - Financing/Cash Collections**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	C. Montgomery	0.70	560.00	B230	Communications with T Moyron R Adcock regarding adequate protection fees dispute.
08/20/20	T. Moyron	0.20	119.85	B230	Analyze J. Schlant email and hurdle analysis.
08/26/20	K.M. Howard	0.40	100.30	B230	Analysis of Stipulation extending Challenge Deadline for Verity MOB Financing, LLC and UCC and reviewed and revised Critical Dates Memorandum.
08/26/20	K.M. Howard	0.40	100.30	B230	Analysis of Stipulation extending Challenge Deadline for Verity MOB Financing II and UCC and reviewed and revised Critical Dates Memorandum.
08/27/20	T. Moyron	2.40	1,438.20	B230	Conference call with R. Adcock, BRG, et al. re discovery (1.1); analyze discovery and related documents and case law (1.3).
08/27/20	K.M. Howard	0.40	100.30	B230	Analysis of Order Approving Stipulation Between Verity MOB Financing II, LLC and the UCC Extending Challenge Deadline and reviewed and revised Critical Dates Memorandum accordingly.
08/27/20	K.M. Howard	0.40	100.30	B230	Analysis of Order Approving Stipulation between Verity MOB Financing, LLC and the UCC extending Challenge Deadline and reviewed and revised Critical Dates Memorandum.
08/31/20	T. Moyron	0.10	59.93	B230	Analyze EMMA noticed filed by Wells Fargo.
09/01/20	T. Moyron	1.50	898.88	B230	Conference call with Mintz, C. Montgomery re Cain and Houlihan (.4); follow up call with D. Bleck (.4); analyze DIP order (.1); conference call with R. Adcock, BRG, et al. (.5); call with J. Moloney (.1).
09/01/20	T. Moyron	0.50	299.63	B230	Analyze emails from lenders, et al. re substitution and reconveyance and calculations of interest and fees (.4); prepare correspondence re same (.1).
<b>Subtotal</b>		<b>7.00</b>	<b>3,777.69</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B240 - Tax Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	J.A. Moe, II	0.10	59.93	B240	Review E-Mails from Bob Richards and Amanda Brown on amount allegedly due for Oregon Taxes.
	<b>Subtotal</b>	<b>0.10</b>	<b>59.93</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B250 - Real Estate**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	M.M. Welch	1.10	294.53	B250	Read email from Jon Emerson from Berkeley Research Group regarding the Huntington HTF Lease (.10); review Termination and Settlement Agreement(.20); review UCC2019 Searches (.80).
08/05/20	M.M. Welch	2.50	669.38	B250	Review 2019 UCC Search Results (2.50)
08/06/20	M.M. Welch	4.10	1,097.78	B250	Read email from Jon Emerson from Berkeley Research Group regarding the Huntington HTF Lease (.10); perform research to verify UCC1 Financing Statements searches in previous CSC Search 2019 results to confirm that there are no Fixture Filings recorded for the O'Connor Hospital for the Huntington HTF Lease (4.00).
08/07/20	M.M. Welch	1.00	267.75	B250	Read email from Jon Emerson from Berkeley Research Group regarding the Huntington HTF Lease (.10); review Addendum to Notice of Assessment and Payment of Contractual Assessment required and California First Payoff Statement (.50); respond to email from Jon Emerson attaching draft of Payoff Letter and pdf's of UCC3 Terminations (.40)
08/25/20	G. Medina	1.70	498.53	B250	Call with J. Emerson regarding Mechanics Lien Searches and results (0.2); review files and send J. Emerson CSC Mechanic's Lien searches received (0.4); review and retrieve mechanic's Liens for FTG Builders and Swinnerton at the request of J. Emerson and send for his consideration (0.5); review and send to J. Emrson chart of Lien Searches prepared at the request of C. Montgomery (0.6).
08/26/20	G. Medina	0.20	58.65	B250	Communication with M. Welch regarding Certain Mechanic's Lien releases.
08/26/20	J.A. Moe, II	0.10	59.93	B250	In regard to Priority Mechanics Lien Claims, review E-Mails from Margaret Welch on allowance and payment of Mechanics' Lien Claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	C. Richter	0.30	193.80	B250	Call with M. Welch regarding cancellations and title policies.
08/31/20	G. Medina	1.70	498.53	B250	Review docket related to Summers & Sons Mechanic's Lien Notice per the request of C. Montgomery (0.4); communications with C. Montgomery regarding Summers & Sons Mechanic's Lien Notice (0.1); Review complaint related to Summers and Confer with T. Moyron regarding Complaint (0.4); Assisted M. Welch review docket for additional sale orders regarding, Seton and St. Vincent and review language related to Payoff Letters per her request (0.7); Call with M. Welch regarding language in the Pay off Letter (0.1).
09/01/20	C. Richter	0.20	129.20	B250	Email to Dentons team regarding title policies.
09/01/20	C. Richter	0.70	452.20	B250	Call with B. Klein and conference with Maslon firm regarding cancellation of deeds of trust, fixture filings and UCC financing statements.
09/01/20	C. Richter	0.90	581.40	B250	Draft follow-on email to Mason firm with forms of deed and fixture cancellations and instructions.
09/01/20	C. Richter	0.40	258.40	B250	Email to U.S. Bank's Jones Day counsel regarding cancellation of deeds of trust, fixture filings and UCC financing statements.
09/01/20	C. Richter	0.20	129.20	B250	Set up call with Jones Day counsel.
09/01/20	C. Richter	0.50	323.00	B250	Email and call from M. Preusker regarding releases.
09/02/20	C. Richter	0.30	193.80	B250	Email from title attorney regarding review of initial cancellation of deed of trust.
<b>Subtotal</b>		<b>15.90</b>	<b>5,706.08</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B260 - Board of Directors Matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	T. Moyron	0.90	539.33	B260	Conference call with R. Adcock re Board meeting and plan matters (.6); prepare correspondence re resolution (.1); analyze matters related to dissolutions and plan language (.2).
09/02/20	T. Moyron	1.30	779.03	B260	Analyze R. Adcock, et al., correspondence regarding deck, Board meeting, resolutions, etc. (.7); analyze resolutions and board deck and prepare comments on same (.6).
09/03/20	S. Maizel	2.00	1,600.00	B260	Telephone conference with Board re plan effective date issues, etc.
	<b>Subtotal</b>	<b>4.20</b>	<b>2,918.36</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	N. Koffroth	2.50	1,253.75	B300	Call with P. Chadwick, D. Galfus, et. al. re administrative claims reserve (1.1); internal call re administrative claims reserve (1.4)
08/01/20	C. Montgomery	5.50	4,400.00	B300	Communications with J Schlant, T Moyron, H Kevane, L Whidden regarding administrative claims and plan (.5); phone call with L Whidden regarding administrative claim review (.1); phone call with T Moyron regarding MPT assignment and SGM claim (.4); review cases and communication with M Zeefe re same (.1); participate in phone conference with H Kevane, T Moyron, regain risk pool estimates (1.2); draft Verity effective date diagram (.3); phone call with T Moyron re Chadwick Declaration (.1); participate in Dentons conference call with T Moyron, S Maizel, M Zeefe , R Richards,L Whidden regarding confirmation issues (1.4); follow up calls with L Whidden (.5); review objections to confirmation for feasibility issues (.4); draft note regarding 1129(a)(11)(.5).
08/01/20	R. Richards	0.70	506.10	B300	Review revised admin claimant chart (0.3); portion of call re admin claims (0.4).
08/01/20	S. Maizel	1.40	1,120.00	B300	Telephone conference with T. Moyron, etc. re admin expense claims.
08/03/20	T. Moyron	2.70	1,617.98	B300	Conference call with BRG, N. Koffroth, et al. re admin claims and reserve (1.5); conference call with BRG, N. Koffroth, et al. re admin claims (1.0); exchange emails with J. Schlant re admin claims chart (.2).
08/03/20	T. Moyron	1.50	898.88	B300	Calls with J. Schlant and J. Emerson re admin claims reserve and analysis for Court.
08/03/20	C. Montgomery	0.20	160.00	B300	Phone call with T Moyron regarding administrative claim safety net.
08/03/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review the Docket and extract Alcon Claim, then review the Alcon Claim.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, E-Mail to Karleen Murphy on two Charts on Claims analyzing the SIR.
08/03/20	J.A. Moe, II	2.70	1,617.98	B300	In regard to the review of Administrative Claims in connection with the Plan, extended telephone call on accounting for Administrative Claims with John Schlant, Jon Emerson, Tania Moyron, Nick Koffroth and George Medina, on review of and continuing work on Exhibit on such Claims (1.50); telephone call with John Schlant on review of Administrative Claims filed Claim Form (.10); second extended conference telephone call with Messrs. Schlant, Emerson, Koffroth and Medina, and Ms. Moyron reviewing updated Chart on Administrative Claims (1.10).
08/03/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, E-Mail to and telephone call from Karleen Murphy on amount of the reserve for the SIR (.10); telephone call to John Schlant on amount of the SIR for the Exhibit (.10).
08/03/20	J.A. Moe, II	0.10	59.93	B300	In regard to review of Administrative Claims in connection with the Plan, review Elina Tilman's E-Mail on Elizabeth Siquian.
08/04/20	J.A. Moe, II	1.20	719.10	B300	In regard to the review of Administrative Claims in connection with the Plan, outline first draft of first of three descriptions of Claims for Peter Chadwick;'s Declaration, then prepare first and second of three descriptions, then revise and expand two descriptions (.60); telephone call with Claude Montgomery on Administrative Claims (.20); revise the descriptions (.20); telephone call with Jon Emerson on describing five Claims for the descriptions, completing the descriptions as to those five claims (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	J.A. Moe, II	0.40	239.70	B300	/MCG Health/ In regard to the review of Administrative Claims in connection with the Plan, review Michell McMahon's E-Mails on Claim of MCG Health (.10); two telephone calls with and E-Mail to Jon Emerson on Claim of MCG Health (.20); telephone call to Michelle McMahon discussing payment of MCG Health (.10).
08/04/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review E-Mails to and from Claude Montgomery and Tania Moyron on Declaration Of Peter Chadwick, and continuing work on Administrative Claims Chart.
08/04/20	J.A. Moe, II	2.60	1,558.05	B300	In regard to the review of the Administrative Claims in connection with the Plan, conference call with Claude Montgomery, Tania Moyron, Lee Whidden, Sam Maizel and Nick Koffroth on Peter Chadwick's Declaration and review and analysis of the Administrative Claims Chart (1.20); conference telephone call with Jon Emerson on Chart (.10); additional extended conference call with Jon Schlant, Jon Emerson, Tania Moyron, Nick Koffroth and George Medina, continuing to review and refine the Chart on Administrative Claims (1.30).
08/04/20	J.A. Moe, II	0.50	299.63	B300	In regard to the review of Administrative Claims in connection with the Plan, exchange E-Mails with Tori Guilfoyle on language for Claim for Infor (US) Inc. (.10); review and edit the proposed language for the Order, and transmit for internal review (.20); confer with Tania Moyron, correct Declaration, and transmit to Ms. Guilfoyle (.20).
08/04/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, E-Mail to Bob Richards on U.S. Foods; review response and forward to Jon Emerson and John Schlant.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, E-Mail to Bob Richards on Long Beach Memorial Medical Center.
08/04/20	G. Medina	3.10	909.08	B300	Conference call with BRG and Dentons regarding Admin claims (1.0); pull plan confirmation Objections, create updated list and send in a zip file (1.3); prepared assemble and draft order regarding United Cure Objection Stipulation (0.8).
08/04/20	S. Alberts	0.20	160.00	B300	Review administration claim material.
08/04/20	R. Richards	0.30	216.90	B300	Respond to inquiries on admin claims.
08/04/20	K.M. Howard	0.30	75.23	B300	Received and reviewed BRG's chart of administrative claims (.2); telephone conferences with J. Moe regarding review of same (.1).
08/05/20	G. Medina	10.00	2,932.50	B300	Call with J. Moe re administrative Claims and further analysis (0.5); Review all administrative claims filed in the first and second bar date periods analysis to ensure that all admin claims were captured (2.0); received request from B. Richards regarding extensive analysis of payor claims (0.1); Call with Dentons team and BRG to discuss administrative and priority claims to be paid or reserved for Plan Effective Date, [REDACTED] [REDACTED] admin claim notice filed (0.4); review docket, claims register and schedules where payor claimant's have been referenced (6.0); call with D. Pina re same. (0.4).
08/05/20	J.A. Moe, II	0.10	59.93	B300	In regard to the review of Administrative Claims in connection with the Plan, review John Schlant's E-Mail on and preliminarily review the Settlement Agreement.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Administrative Claims in connection with the Plan, exchange E-Mails with Tania Moyron and explain task of reconciling Administrative Claims to insure all are accounted for in the Chart (.10); review reconciliation and forward to Jon Emerson(.10); and telephone call with Mr. Emerson on reconciliation (.20).
08/05/20	J.A. Moe, II	2.00	1,198.50	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call with Guy Phipps, then telephone call with Margaret Pfeiffer, on Alcon Vision Claim (.40); review E-Mail on St. Francis inventory and telephone call from Teri Pasion on inventories (.10); review Alcon Claim again (.10); conference call with Margaret Pfeiffer, Guy Phipps and Teri Pasion on reconciliation (.20); E-mail to conferees on Invoices (.10); telephone call from Abbi Robles on continuing work to track inventory (.20); telephone call to George Apostolides' office on status (.10); telephone call with Abbi Robles and Surgeon at Seton, on inventory of product at Seton and how to proceed in view of Alcon/AHMC pending agreement (.30); telephone call with Jon Emerson and John Schlant on status of review (.10); E-Mails and telephone call from George Apostolides on resolution of Claim (20); E-Mails to, telephone call with and calculation of claim for John Schlant (.20).
08/05/20	J.A. Moe, II	0.60	359.55	B300	In regard to the review of Administrative Claims in connection with the Plan, conference call with Jon Schlant, Jon Emerson, Tania Moyron, Claude Montgomery, Nick Koffroth and Bob Richards on additional review and revisions to Exhibit identifying Claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	D. Pina	1.10	350.63	B300	Communications regarding request for information related to insurance company payor agreements in connection with reconciliation of administrative expense claims (.2); commence review of docket sheet, claims register and related filings in connection with analysis (.6); coordinate with G. Medina (.3).
08/05/20	R. Richards	0.80	578.40	B300	Call with Ori Katz on equipment abandonment (0.2); participate in claims call (0.4); emails re Long Beach admin claims (0.2).
08/05/20	J.A. Moe, II	0.80	479.40	B300	In regard to the review of Administrative Claims related to the Plan, revise descriptions of Administrative Claims for Peter Chadwick's Declaration (.20); review updated Exhibit and further update descriptions to reflect the updated information in the Exhibit (.30); forward Exhibit to Claude Montgomery and Jon Emerson for review (.10); update description in the Exhibit and return to Claude Montgomery (20).
08/05/20	N. Koffroth	0.10	50.15	B300	Call with J. Moe, et al. re Alcon Vision
08/06/20	G. Medina	9.50	2,785.88	B300	Lodge order (0.4); continue to review docket, claims register and schedules where all payor claimant's have been referenced (8.1); call with D. Pina to review schedule prepared to ensure all information was captured per the request of B. Richards (0.4) received and revised chart from D. Pina (0.3); email to B. Richards regarding updated Payor claims chart (0.3).
08/06/20	D. Pina	3.00	956.25	B300	Conference with G. Medina regarding status and completion of administrative claim reconciliation project (.5); analyze docket sheet, claims register and schedules and cross-reference cites and references in schedule summarizing related cites (1.6); review and revise schedule prepared by G. Medina (.9).
08/06/20	J.A. Moe, II	0.10	59.93	B300	/MCG Health/ Review Michelle McMahon's E-Mail and forward Invoices of MCG Health to Jon Emerson.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	T. Moyron	0.50	299.63	B300	Conference call with E. Goldstein, AppleCare, H. Kevane, BRG, et al. re AppleCare's asserted admin claim.
08/10/20	T. Moyron	0.50	299.63	B300	Conference call with Applecare, BRG, et al. re reserve.
08/10/20	M. Zeefe	0.40	192.10	B300	Emails with R. Adcock and PBGC finalizing settlement post-order.
08/11/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call from Tania Moyron and John Schlant, reviewing the amount of the reserve for Alcon Vision.
08/12/20	S. Alberts	0.30	240.00	B300	Communication about plan issues, mainly concerning union and pension claims.
08/13/20	R. Richards	0.10	72.30	B300	Emails re amending California tax claims.
08/17/20	N. Koffroth	2.80	1,404.20	B300	Research and analyze issues concerning statute of limitations under state Uniform Voidable Transactions Act
08/18/20	T. Moyron	1.70	1,018.73	B300	Conference call with H. Kevane, Milbank, etc. re BASM (.3); conference call with R. Adcock re potential claims and Plan (.8); analysis of R. Adcock email re Integrity Management (.1); analyze matters related to Integrity and former management (.4); prepare email to R. Adcock re same (.1).
08/18/20	N. Koffroth	0.40	200.60	B300	Draft internal memorandum concerning certain critical vendor agreement issues
08/18/20	S. Maizel	0.20	160.00	B300	Telephone conference with T. Moyron re admin expense issues (x2).
08/19/20	T. Moyron	0.50	299.63	B300	Conference call with BRG, et al. re claims, charts regarding allowed claims on effective, date, etc.
08/19/20	S. Alberts	0.30	240.00	B300	Conference with M. Zeefe about Plan effective date and certain claims objections.
08/19/20	R. Richards	0.20	144.60	B300	Emails re tax claims.
08/19/20	K. Murphy	0.10	41.65	B300	Telephone call with John Moe re preparation of updates to Verity Litigation Management Charts.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/19/20	J.A. Moe, II	0.30	179.78	B300	/Dell Financial/ In regard to the review of Administrative Claims in connection with the Plan, review Mr. Simpson's inquiry on the amount due Dell Financial, and exchange E-Mails with Peter Chadwick and Jon Emerson on postpetition obligation (.20); telephone call to Charles Simpson's office on Invoices (.10).
08/19/20	M. Zeefe	1.30	624.33	B300	Call with BRG, Dentons re effective date claims payments (0.4); review claims stipulations and settlements (0.8); call with S. Alberts re pension claims (0.1).
08/20/20	A. Ruegger	2.80	2,240.00	B300	Communications with Dentons team re potential claims arising from 2015 and 2017 transactions (0.9); continued review of background materials re same (1.0); communications with Milbank re document requests (0.4); communications with Dentons team re potential joint interest agreement with Liquidating Trustee (0.5).
08/20/20	T. Moyron	1.20	719.10	B300	Conference call with M. Shinderman and J. Behrens re Toyon, payments to former management, etc. (.6); conference call with R. Adcock re conference call with Milbank (.3); analyze email from J. Behrens re same (.1); analyze and prepare correspondence regarding same (.2).
08/20/20	S. Maizel	0.20	160.00	B300	Review and respond to emails re Toyon issues.
08/20/20	N. Koffroth	6.80	3,410.20	B300	Draft memorandum analyzing settlements and stipulations related to releases and effective date payments
08/21/20	G. Medina	3.00	879.75	B300	Team Call regarding Claims Reconciliation (0.6); Call with D. Pina regarding Assistance on review of claims (0.3); Team Call with Additional issues related to scope of claims and (1.0); Call with J. Moe regarding Schedule E priority claims and extract all Schedules E filed and send to J. Moe for review (0.7); call with J. Moe regarding Scheduled Claims (0.2); send to J. Moe per his request the Global Notes field with each Schedule for his Review (0.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/21/20	C. Montgomery	1.20	960.00	B300	Phone conference re plan claim resolutions for effective date (.9); phone call with T Moyron re Class 1A claims (.1); communications with M Welch re UCC requests for Mechanic's liens (.2).
08/21/20	D. Pina	6.50	2,071.88	B300	Communications regarding claims reconciliation (.4); telephone conferences with Verity team regarding claims related to mechanics liens, non-tax priority unsecured claims and scheduled employee claims (1.); analysis of schedules and claims register and commence identifying non-tax priority unsecured claims and scheduled employee claims (2.2); analysis of Plan regarding provisions addressing treatment of claims (.9); prepare and plan for execution of related claims review (.7); assemble working list of claims to be reviewed extracted from claims register and BRG lists (1.3).
08/21/20	J.A. Moe, II	0.30	179.78	B300	/Priority Claims/ Telephone call from Tania Moyron on administration of Priority Claims, scheduled and filed, and review of terms of the Plan on time to review and object, allowance and payment.
08/21/20	J.A. Moe, II	0.20	119.85	B300	Telephone call returned from Karleen Murphy on updating the "Master Chart" on Litigation and "claims," and review of how Dentons proceeds post Effective Date, and review of alternative Charts.
08/21/20	J.A. Moe, II	3.00	1,797.75	B300	In regard to the review of Administrative Claims in connection with the Plan, conference telephone call with Tania Moyron, Claude Montgomery, Malka Zeefe, George Medina, John Schlant, and Jon Emerson, on review of Mechanics' Liens Claims, and review of Priority Claims and payment procedures (80); follow up telephone call on review of Schedule E for each Debtor (.20); telephone call from Jon Emerson on classification of Priority Claims (.20); review three Priority Claims, reviewing Schedules E & F, Global Notes and Form 206 E/F with Mr. Medina (.70); telephone calls with Geoffrey Miller, Casey Doherty, Kathryn Howard and Norman

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					Haslun on Schedules E & F (.40); review Global Notes again (.10); review Form 206 E/F in the Schedules of St. Vincent and arrange for copies of all seventeen Form 206 E/F (.30); review Chart on Priority Claims, then telephone call with John Schlant and Jon Emerson on Priority Claims (.20); E-Mail to Priority Calms Group on initial conclusion on Priority Claims (.10).
08/21/20	J.A. Moe, II	0.40	239.70	B300	Commence analysis of the Priority Claims as scheduled by the Debtors in the Bankruptcy Schedules.
08/21/20	K. Murphy	0.10	41.65	B300	Confer with John Moe re status of updated Verity Litigation Management Charts.
08/21/20	T. Moyron	1.90	1,138.58	B300	Conference call with N. Koffroth re claims, plan and reserves (.6); analyze priority claim excel chart and plan requirements (1.3).
08/21/20	T. Moyron	1.70	1,018.73	B300	Conference call with BRG, J. Moe, et al. re claims and effective date (.5); call with BRG, J. Moe, et al. re mechanic liens, various claims, et. (.9); analyze BRG emails and claim chart (.3).
08/21/20	K.M. Howard	0.20	50.15	B300	Reviewed email from J. Moe regarding Schedule E and prepayment of PTO to employees (.1); telephone conference with J. Moe regarding discussion with N. Haslun during preparation of Schedule E regarding the prepayment (.1).
08/21/20	R. Richards	0.80	578.40	B300	Prepare Cochlear 503(b)(9) stipulation (0.3); review chart of open priority claims (0.5).
08/21/20	M. Zeefe	1.00	480.25	B300	Calls with BRG, Dentons re effective date claims.
08/22/20	M. Zeefe	0.70	336.18	B300	Call with BRG, Dentons re effective date claims (0.6); call and emails re same (0.1).
08/22/20	N. Koffroth	1.80	902.70	B300	Draft priority claims analysis

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/22/20	G. Medina	6.20	1,818.15	B300	Communication with T. Moyron regarding pulling health care provider claims (0.1); review and retrieve health care provider claims and send to T. Moyron, J. Moe and D. Pina (1.2); Numerous calls with J. Moe to discuss claims review (0.4); review and highlight healthcare provider claims and communication with KCC regarding pulling additional claims (0.8); review Insurance Claims and Trade Claims (3.7).
08/22/20	J.A. Moe, II	1.00	599.25	B300	Complete an analysis of each of the Priority Claims as scheduled by the Debtors, identifying 23 Claims (.70); telephone call to Jon Emerson on review of scheduled Priority Claims, and discussing five large Tax Claims (two disputed, three undisputed), and necessity to determine if three undisputed Claims have been paid (.30).
08/22/20	J.A. Moe, II	0.90	539.33	B300	Participate in conference call on analysis of all Priority Claims, with Tania Moyron, Claude Montgomery, Malka Zeefe, George Medina and Daniel Pina, reviewing first Priority Claims as scheduled by the Debtor, then reviewing Trade Claims/Health Care Provider Claims (.60); telephone call with George Medina and Daniel Pina on Insurance and Health Care Claims (.30).
08/22/20	D. Pina	3.50	1,115.63	B300	Communications regarding claims reconciliation (.2); telephone conference with G. Medina regarding further preparation and organization of materials for claims reconciliation (.4); work on assembly of working set of claims in connection with review and identification of insurance claims falling into bucket of non-tax priority unsecured claims (1.2); draft working list of insurance claims (.5); further review and revise list of insurance claims and incorporate G. Medina results and revisions (.6); continue analysis of claims register and further identifying non-tax priority unsecured claims (.6).
08/22/20	C. Montgomery	0.60	480.00	B300	Participate in conference call regarding Claims with J. Moe, T. Moyron and G. Medina.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/23/20	D. Pina	2.00	637.50	B300	Follow-up communications regarding claims reconciliation (.2); telephone conference with G. Medina regarding further preparation and organization of materials for claims reconciliation (.5); continue work on assembly of working set of claims in connection with review and identification of insurance claims falling into bucket of non-tax priority unsecured claims (.7); further review and revise list of insurance claims and incorporate additional G. Medina revisions (.6).
08/23/20	J.A. Moe, II	0.10	59.93	B300	Review E-Mails to and from Malka Zeefe, Tania Moyron, John Schlant and Jon Emerson on characterizing and reviewing Claims asserted as Priority Claims.
08/23/20	J.A. Moe, II	0.30	179.78	B300	Commence review of "TradeClaims/Health Care Provider Claims," in regard to characterization.
08/23/20	J.A. Moe, II	2.80	1,677.90	B300	In regard to Insurance Priority Claims, telephone call with George Medina on Insurance Claims, and preliminarily review List with Mr. Medina (.10); perform analysis of 26 Insurance Claims (1.10); telephone call with Jon Emerson on analysis of Insurance Priority Claims and necessity to reformat and add Claims to the List (.20); exchange E-Mails with George Medina on how to proceed in regard to analyzing Insurance Claims (.10); exchange E-Mails with George Medina identifying additional Priority Insurance Claims (.10); review new Chart from Jon Emerson, then telephone call with Mr. Emerson reviewing the Chart and analysis of the Insurance Priority Claims (.30); exchange E-Mails with George Medina and review Claims of Old Republic, FIC, Ace, Illinois Union and United Healthcare (.20); review a Claim of Old Republic and the Addendum (.20); review copy of all ACE Claims (none of which are Priority) (.20); telephone call with George Medina on Priority Claims (.30).
08/23/20	J.A. Moe, II	0.10	59.93	B300	Review and calculate number of Trade Claims / Health Care Provider Claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/23/20	G. Medina	3.20	938.40	B300	Work on chart related to review and analysis of claims related to claims reconciliation (1.2); Conference Call with J. Moe, D. Pina regarding insurance claims (0.4) reviewed and pulled claims requested by J. Moe (0.6); Continue to review claims related to reconciliation (1.0)
08/23/20	M. Zeefe	0.30	144.08	B300	Call with N. Koffroth re effective date claims issues (0.2); emails with T. Moyron re same (0.1).
08/24/20	M. Zeefe	1.70	816.43	B300	Create chart of effective date claims for payment (1.3); call with BRG, Dentons re same (0.4).
08/24/20	G. Medina	6.00	1,759.50	B300	Continue to review claims related to Claims analysis (4.5); Multiple calls with J. Moe and D. Pina and Review(0.7); Revise chart created of analysis of insurance claims at the request of J. Moe (0.4); Pull and review schedules on KCC Claims (0.4).
08/24/20	J.A. Moe, II	0.40	239.70	B300	In regard to the review of Scheduled Tax Claims, orchestrate the preparation of a Chart on Scheduled Tax Claims (.10); review and revise the first draft of the Chart (.20); review second draft of the Chart (.10).
08/24/20	J.A. Moe, II	1.20	719.10	B300	In regard to Trade Claims/Health Care Provider Claims: Review Jon Emerson's revised and expanded List of Trade Claims/Health Care Provider Claims, and telephone call with Jon Emerson on newly created Claims List (.20); telephone call with Tania Moyron on analyzing Claims (.10); telephone call with Bob Richards on review of types of Claims in the Category, and identify and transmit to Mr. Richards a sampling of Claims (.20); review Mr. Richard's initial analysis of the sample Claims and telephone call on review (.10); identify and transmit List of all Claims to Bob Richards (.10); telephone calls with Karen Chapman and exchange E-Mails with Ms. Chapman and Nam Nguyen on analysis of Claims (.20); conference telephone call with Bob Richards, Karen Chapman and Nam Nguyen on analysis of Priority Claims (.30).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	J.A. Moe, II	0.30	179.78	B300	Telephone conference with Tania Moyron, Malka Zeefe and Jon Emerson on continuing analysis of the Priority Claims, discussing Insurance Claims, Trade Claims/ Health Care Provider Claims and other Priority Claims.
08/24/20	J.A. Moe, II	3.10	1,857.68	B300	In regard to the review of Priority Insurance Claims: Review and transmit Proofs Of Claim, and internal telephone call on identification and review of Claims (.20); telephone call with Sam Alberts on analysis of the Cigna Claims (.20); telephone call with George Medina and Daniel Pina on current status on review of Claims, and necessity to review the FIC, Illinois Union and Health Net Claims, and further review of Old Republic and Cigna Claims (.20); telephone call with Robert Millner on Old Republic and transmit three set of documents on Old Republic Claims to Mr. Millner (.20); review and identify the Old Republic Claims and transmit to Robert Millner (.30); confer with Robert Millner on initial analysis (.10); review all Health Net Claims (none of which are Priority) (.10); review and respond to Daniel Pina's analysis of Illinois Union Claims (.10); exchange E-Mails with George Medina on FIC Claims (.10); study and review the Life Insurance of North America/CIGNA Claims, reviewing Claims and two Charts, and confirming conclusions with Jon Emerson (.70); telephone call to Andres Estrada on Amended Claims (.10); telephone call with Sam Alberts on Amended Claims, and transmit three Cigna Claims to Mr. Alberts (.10); telephone call with George Medina analyzing and revising Internal Chart on Claims (.50); review an FIC Claim and confer with Jon Emerson on decision on recognition of Administrative Claims based on pleading (and not on use of GUS Claim Form) (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	D. Pina	5.40	1,721.25	B300	Follow-up communications with G. Medina regarding claims reconciliation (.2); telephone conferences with G. Medina and J. Moe regarding further preparation and organization of materials for claims reconciliation (.5); continue work on assembly of working sets of claims (.3); additional conference with J. Moe and G. Medina regarding status of insurance claims (.5); work on review and summarizing Illinois Union Insurance claims (3.6); related follow-up internal communications with G. Medina and J. Moe (.3).
08/24/20	N. Koffroth	1.10	551.65	B300	Draft stipulation and order re Committee standing related to Integrity claims
08/24/20	N. Koffroth	0.40	200.60	B300	Participate in call with J. Schlant, J. Emerson, et al. re analysis of priority claims
08/24/20	D. Cook	0.60	283.06	B300	Analysis regarding section 507(a) priority (.2); pull case law for S Alberts review regarding same (.2); telephone conference with S Alberts regarding same (.2).
08/24/20	T. Moyron	0.50	299.63	B300	Analyze email from Committee counsel and attached stipulation (.2); prepare correspondence regarding same (.1); analyze previous emails re same (.1); analyze R. Adcock, et al. emails re same (.1).
08/24/20	T. Moyron	1.90	1,138.58	B300	Conference call with BRG, et al., re priority claims and other claims (.3); analyze J. Emerson email and chart, et al. (.4); analyze trade and insurance claim matters (.6); analyze charts related to payments on the effective date and related matters (.4); correspond with J. Emerson, et al. re same (.2).
08/24/20	R. Millner	0.20	160.00	B300	Telecon J. Moe re ORIC claims.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	S. Alberts	1.50	1,200.00	B300	VHS Claims. Conference with J. Moe about objection to priority claims objections, notably Cigna (.4), request Collier's on 507(a)(5) to assess potential issues (.1), receive and review (.4) and request specific cases (.2), obtain and review Cigna POCs and form initial view (.2) receive follow up J. Moe concerning amended Cigna claims that require review (.2).
08/24/20	S. Alberts	0.80	640.00	B300	VHS Admin. Confer with T. Moyron about RPHE administrative expense and next steps (.3), communication with D. Galfus (.2) and client about RPHE August invoice (.1) and arrange for next steps (.2).
08/24/20	R. Richards	2.00	1,446.00	B300	Review sampling of medical provider services proofs of claim (1.3); review complete claims list of medical provider claims (0.3); prepare proposed analysis framework for same (0.2); call re same (0.2).
08/25/20	R. Millner	0.20	160.00	B300	Email to J. Moe re Old Republic proofs of claim.
08/25/20	D. Pina	1.40	446.25	B300	Communications regarding updates to schedules prepared in connection with claims reconciliation (.4); analysis of revised charts and provide comments and edits to G. Medina (1.).
08/25/20	G. Medina	0.40	117.30	B300	Call with J. Moe related to claims reconciliation (0.2); revise Insurance chart per the request of J. Moe (0.2);
08/25/20	J.A. Moe, II	0.20	119.85	B300	In regard to Priority Insurance Claims: Telephone call from George Medina discussing one change to the Internal Chart (.10); review revised Internal Chart, then telephone call with Mr. Medina on further minor revisions (.10);

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	J.A. Moe, II	1.50	898.88	B300	In regard to Priority Insurance Payments: Review each of thirty Claims, then prepare notes on amendments to the LINA/CIGNA Claims, then confer with George Medina on completing draft of the Internal Chart (.70); review and take notes on four Categories of Claims (.10); commence research on section 507(a)(5) of the Bankruptcy Code (.70).
08/25/20	J.A. Moe, II	0.90	539.33	B300	In regard to the Trade Claims/Health Care Provider Claims: Review Nam Nguyen's analysis of the Claims (.10); telephone call to Ms. Nguyen reviewing her annotations to each Claim (.20); prepare for and telephone call with Nam Nguyen, Karen Chapman and Bob Richards on Nam Nguyen's analysis of the Claims (.60).
08/25/20	J.A. Moe, II	0.10	59.93	B300	Telephone call to Andres Estrada and request copies of three sets of claims.
08/26/20	C. Montgomery	0.20	160.00	B300	Phone call with J Emerson re FTG mechanics lien assignment(.1) ; review communications re same (.1)
08/26/20	G. Miller	0.10	44.20	B300	Call with R. Richards re research re claims barred by administrative claims bar date.
08/26/20	N. Koffroth	0.70	351.05	B300	Participate in call with J. Schlant, J. Emerson, et al. re claims reconciliation
08/26/20	D. Pina	1.00	318.75	B300	Verity - follow-up communications regarding claims reconciliation project (.2); analyze, organize and update electronic working files related to claims reconciliation (.8).
08/26/20	N. Koffroth	1.60	802.40	B300	Draft analysis of priority claims

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/20	J.A. Moe, II	3.10	1,857.68	B300	In regard to the Priority Insurance Claims: Review updated Internal List and transmit the Internal List to Tania Moyron (.20); telephone call with Tania Moyron on review of the Internal Claims Chart (.10); telephone call with Sam Alberts on treatment of Priority Insurance Claims (.10); exchange E-Mails with Sam Alberts on analysis (.10); telephone call to UNUM and telephone call and E-Mail to LINA/Cigna (.20); confer with Nick Koffroth and return call telephone call from Henry Kevane on LINA/Cigna (.20); review Consolidated Freightways Case, the Howard Deliveries' Case and Colliers on Section 507(a)(5) (.90) ; conference telephone call with John Schlant, Jon Emerson, David Galfus and Sam Alberts on calculation of the amount payable under Section 507(a)(5) (.50); telephone call with Jon Emerson on continuing review of Priority Claims (.40); E-Mail to Andres Estrada on identifying three Cigna Claims (.10); prepare extensive E-Mail to Tania Moyron on conference call (.30).
08/26/20	J.A. Moe, II	0.90	539.33	B300	In regard to Priority Claims: Conference telephone call with Tania Moyron, Malka Zeefe, Nick Koffroth, Jon Emerson and John Schlant, on analysis and review of Priority Claims (.60); telephone calls and/or E-Mails on setting up conference call on Priority Insurance Claims and previous payments to employees (.20); telephone call from Nick Koffroth on Claim asserted by K Force (.10).
08/26/20	J.A. Moe, II	0.60	359.55	B300	In regard to Priority Trade Claims/Health Care Provider Claim: Review Nam Nguyen's updated Chart (.10); two telephone calls with Nam Nguyen on additional information on List of Claims (.10); telephone call with John Schlant and exchange E-Mails with Mr. Schlant on coverage of CNA and Local 39 Claims (.20); exchange E-Mails with Bob Richards on review (.10); additional telephone call with Nam Nguyen on continuing review of Claims (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/20	J.A. Moe, II	0.50	299.63	B300	In regard to the review of Administrative Claims in connection with the Plan: Telephone call from Jon Emerson on Cigna Administrative Claims (.10); E-Mail to and response from Andres Estrada on Cigna Claims (.10); review three Cigna Administrative Claims (.20); telephone call with Jon Emerson on review of three Cigna Claims (.10).
08/26/20	M. Zeefe	0.70	336.18	B300	Call with BRG, Dentons re effective date claims.
08/26/20	G. Medina	0.90	263.93	B300	Edits to Coachlear Americas Stipulation regarding Claims at the request of T. Moyron (0.3); further edits and filed stipulation (0.3); Upload order (0.1) download and send to B. Richards, T. Moyron and team (0.2).
08/26/20	S. Alberts	1.50	1,200.00	B300	Review Scotus opinion (.3), conference with J. Moe about priority issue (.3), draft email about position on claims (.3) and follow up (.1); conference with BRG and J. Moe about reserve for 507(a)(5) claims (.5).
08/26/20	T. Moyron	0.80	479.40	B300	Conference call with BRG, J. Moe, et al. re insurance claims, trade health plan claims, excel charts, etc. (.5); conference call with J. Moe re same (.1); analyze correspondence regarding certain claims (.2).
08/26/20	T. Moyron	0.50	299.63	B300	Conference call with R. Adcock, D. Galfus, S. Alberts, and T. Conner re RPHE.
08/26/20	K.M. Howard	0.10	25.08	B300	Analysis of Order Approving Stipulation regarding Prepetition of Cochlear Americas to determine additional requirements or deadlines set by the court.
08/27/20	D. Pina	0.20	63.75	B300	Follow-up communications regarding claims review and reconciliation.
08/27/20	G. Miller	4.50	1,989.00	B300	Research re claims barred by administrative claims bar date and draft memorandum re same.
08/27/20	N. Koffroth	0.70	351.05	B300	Conference call with T. Moyron re plan, claims, and related matters

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	N. Koffroth	0.30	150.45	B300	Call with E. Tilman and J. Moe re priority claims reconciliation
08/27/20	J.A. Moe, II	1.10	659.18	B300	In regard to the review of Trade Claims/Health Care Provider Claims: Telephone call with Nam Nguyen on status of review (.10); telephone call to George Medina on review (.10); review the latest version of the Nguyen List of Claims (.10); review Ty Conner's E-Mail and Nam Nguyen's response and E-Mail on completion of the List (.10); telephone call with Nam Nguyen on List (.10); review updated List (.10); telephone call to Nam Nguyen on changes to the List (.10); confer with Andres Estrada on obtaining Claims, preliminarily review Claims and telephone call with Mr. Estrada and internal call on preparing Claims for review (.20); exchange E-Mails with Tania Moyron, Bob Richards, George Medina and Daniel Pina on review of remaining Claims (.20).
08/27/20	M. Zeefe	1.40	672.35	B300	Call with N. Koffroth re BRG effective date claims chart (1.2); team call re same (0.1); emails with S. Alberts, T. Moyron re employment claims (0.1).
08/27/20	R. Richards	0.50	361.50	B300	Emails re medical provider claims (0.2), call from Jon Emerson of BRG re claims and contracts (0.1), review chart of claims to be paid on the Effective Date (0.2).
08/27/20	T. Moyron	1.20	719.10	B300	Analyze email from J. Schlant and funds flow (.3); prepare email to J. Schlant re same (.1); correspond with H. Grobstein re same (.1); analyze matters related to priority claims and other claims (.7).
08/28/20	M. Zeefe	1.80	864.45	B300	Call with BRG, Dentons re effective date claims (0.4); calls with S. Alberts re employment claims (0.4); emails with T. Moyron re same (1.0).
08/28/20	R. Richards	0.50	361.50	B300	Review open medical provider claims chart (0.2); conference call re same (0.3).
08/28/20	T. Moyron	1.20	719.10	B300	Conference call with J. Schlant, et al. re claims (.5); call with J. Schlant re claims and cash flow (.5); analyze cash flow (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/28/20	S. Alberts	0.60	480.00	B300	Conference with M. Zeefe concerning priority claims issues and options (.4), review proposed communication to T. Moyron (.1) and conference with M. Zeefe regarding same and approval (.1).
08/28/20	N. Koffroth	0.70	351.05	B300	Draft priority claims reconciliation analysis.
08/28/20	N. Koffroth	0.60	300.90	B300	Participate in call with J. Schlant, J. Emerson, et al. re priority claims analysis
08/28/20	J.A. Moe, II	0.40	239.70	B300	In regard to the Priority Claims: Conference telephone call with John Schlant, Jon Emerson, Tania Moyron and Nick Koffroth, discussing the status of and amount of Priority Claims.
08/28/20	J.A. Moe, II	1.00	599.25	B300	In regard to the review of Priority Trade Claims/Health Care provider Claims: Telephone calls with Jon Emerson on analysis of 1099 contractors and 507(a)(4) payments made to employees (.30); conference telephone call with Robert Richards and Tania Moyron on analysis of the Claims (.30); review and split Claims for review by Robert Richards and John Moe (.40).
08/30/20	J.A. Moe, II	0.10	59.93	B300	/Dell Financial/ Review exchange of E-Mails and the accompanying Invoice on the payment to Dell Financial.
08/30/20	J.A. Moe, II	2.60	1,558.05	B300	In regard to the review of Trade Claims/Health Care Provider Claims: Review and confirm three of four sets of Claims, then initially and preliminarily review and determine legitimacy and amount of each of the Accounts Payable Claims, the W-2 Claims and No Record Claims (2.10); itemize the Meditract Claims to be reviewed (.20); E-Mail and telephone call to Andres Estrada on Meditract Claims (.10); telephone call to Jon Emerson discussing payments to any of fourteen Claimants and transmit list of fourteen Claimants to Mr. Emerson (.20).
08/31/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Insurance Priority Claims: Telephone call from UNUM Insurance Company responding to call on August 26th, on UNUM's claim being for

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					premiums (.10); review the analysis of the Tropicana Case again (.10).
08/31/20	J.A. Moe, II	1.10	659.18	B300	In regard to the review of Priority Claims: Conference telephone call with Jon Emerson, John Schlant, Malka Zeefe, Nick Koffroth and Tania Moyron on review of Priority Claims including review of Insurance Priority Claims and Trade Claims\Health Care Provider Claims and Employee Claims (.50); prepare Memorandum on all Priority Claims then edit and revise -- through two iterations -- the Memorandum (.60).
08/31/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Trade Claims/Health Care Provider Claims: Review with John Schlant the List of AP and No Record Claims.
08/31/20	J.A. Moe, II	0.80	479.40	B300	In regard to the review of Meditract Claims: Confer with Andres Estrada on Meditract Claims, and review new set of Claims received from Mr. Estrada (.20); extract, and transmit set of Claims to Robert Richards and telephone call to Mr. Richards on Meditract Claims (.20); first review of Meditract Claims (.40).
08/31/20	J.A. Moe, II	1.30	779.03	B300	In regard to the review of W-2 and No Record Priority Claims: Continue to review, classify and monetize W-2 and No Record Claims (.40); exchange E-Mails with Nam Nguyen and Lisa Ho, and exchange E-Mails with Jon Emerson , on Cristina Sosa's status (.40); exchange E-Mails with Jon Emerson on Lijun Guan's payments (.20); review Claim of Loina Dizon and research basis of purchase (.20); exchange E-Mails with Bob Richards on Christina Solis (.10);
08/31/20	S. Maizel	0.80	640.00	B300	Telephone conference with R. Adcock, etc. re Toyon settlement proposal (.5); review and revise Toyon settlement proposal (.3).
08/31/20	M. Zeefe	0.50	240.13	B300	Call with BRG, Dentons re effective date claims payments (0.4); emails re CNA settlement (0.1).
08/31/20	N. Koffroth	1.20	601.80	B300	Draft stipulation resolving Toyon claims
08/31/20	N. Koffroth	0.40	200.60	B300	Draft priority claims analysis

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	N. Koffroth	0.30	150.45	B300	Email to T. Moyron re analysis of Effective Date accounts and funds flow
08/31/20	R. Richards	2.90	2,096.70	B300	Emails re rejection of contracts and review related provisions (0.4); review medical provider priority claims for reserve purposes and forward potentially valid claims to John Moe (2.4); emails re California tax claims (0.1).
08/31/20	N. Koffroth	0.50	250.75	B300	Participate in call with J. Emerson, J. Schlant, et al. re priority claims analysis
08/31/20	N. Koffroth	0.50	250.75	B300	Participate in call with R. Adcock, P. Chadwick, et al. re proposed claim settlement
08/31/20	T. Moyron	0.30	179.78	B300	Analyze matters related to non-tax priority claims and related correspondence from J. Emerson, et al.
08/31/20	T. Moyron	1.00	599.25	B300	Analyze matters related to complaint and correspond regarding same (.7); analyze matters related to correspondence from Committee counsel (.3).
08/31/20	T. Moyron	0.80	479.40	B300	Conference call with BRG, R. Adcock, S. Maizel, et al. re Toyon. (.5); analyze and prepare comments to settlement agreement (.3).
09/01/20	R. Richards	2.00	1,446.00	B300	Review tax claims (1.2); review prior tax claim notes (0.2); follow up emails on certain tax claims (0.2); calls with Jon Emerson of BRG re same (0.2); emails re medical provider chart (.2).
09/01/20	M. Zeefe	2.30	1,104.58	B300	Review union claims asserted as priority (1.7); call with A. Ruda, T. Moyron re same (0.2); call with S. Alberts re same (0.2); call with N. Koffroth re same (0.2).
09/01/20	T. Moyron	0.90	539.33	B300	Analyze matters related to insurance claims (.4); analyze matters related to union claims (.3); conference call with A. Ruda and M. Zeefe (.1); call with R. Adcock re same (.1).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	J.A. Moe, II	1.90	1,138.58	B300	In regard to the review of Priority Insurance Claims: Review multiple E-Mails from Tania Moyron on the Insurance Claims, then review and transmit list of Claims to Ms. Moyron (.20); exchange of multiple E-Mails with Ms. Moyron on analysis of the Insurance Claims (.10); consider Priority Insurance Claims and telephone calls to Jon Emerson and Norman Haslun discussing payment of Claims (.30); review E-Mail from Joe Vizzini and E-Mail to Nick Koffroth on list of payments (.10); review Claims as to the date filed (.10); review Charts on payments, telephone call to Norm Haslun on payments and E-Mail outlining reduction of Claims (.40); revise Internal Chart on Priority Insurance Claims with George Medina (.40); review Chart, transmit to Tania Moyron, and confer with Tania Moyron on amount (.20); with Mr. Medina, calculate the amount of each Claimants total Claims, and forward to Ms. Moyron (.10).
09/01/20	J.A. Moe, II	0.10	59.93	B300	Confer with Karleen Murphy on updating and reviewing multiple Lists and Charts prepared on litigation and "claims."
09/01/20	J.A. Moe, II	0.80	479.40	B300	In regard to the Trade Clams/Health Care Provider Claims: Review proposed Chart, review Nam Nguyen's Chart, and E-Mails on two revisions to the Chart (.20); exchange E-Mails on analysis of, and additional review of, the Trade Claims/Health Care Provider Claims (.30); further revise the Chart, and forward to Tania Moyron and Bob Richards (.30).
09/01/20	J.A. Moe, II	0.60	359.55	B300	In regard to the Scheduled Priority Tax Claims: Review and make one addition to the Chart on Scheduled Priority Tax Claims (.10); review exchanges of E-Mails with Jon Emerson, telephone call with Mr. Emerson, and preliminarily review Mr. Emerson's Chart on Tax Claims (.30); review and transmit List of Scheduled Priority Tax Claims to Tania Moyron and Bob Richard on analysis of Tax Claims (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	G. Medina	0.60	175.95	B300	Call with J. Moe and revised insurance claim chart.
09/02/20	J.A. Moe, II	0.40	239.70	B300	In regard to Priority Claims: Conference with John Schlant, Jon Emerson, Tania Moyron, Malka Zeefe and Nick Koffroth on Tax Claims, including purchase price allocations, Insurance Claims, Union Claims and Trade Claims/ Health Care Provider Claims.
09/02/20	J.A. Moe, II	1.30	779.03	B300	In regard to the Trade Claims/Health Care Provider Claims: Telephone call and E-Mail to Nam Nguyen on eight Claimants' terms of employment, and telephone call and E-Mail to John Schlant on amount paid to each of eight employees (.40); review John Schlant's new Chart on payments to employees, and then revise Memorandum on amount to be reserved (.30); exchange E-Mails with John Schlant on no further work to be performed (.10); review Nam Nguyen's information on employment history, and revise Memorandum to reflect date of termination for one employee (.20); review revised Chart, make one revision, then transmit to Tania Moyron (.20); exchange E-Mails with Tania Moyron and transmit Chart to Jon Emerson and John Schlant (.10).
09/02/20	J.A. Moe, II	0.40	239.70	B300	In regard to the continuing analysis of "claims:" Assemble and review updated Charts on Litigation Management, Relief From Stay, "Master" Chart on litigation and "claims," Calendar Chart and Trade Claims/Health Care Provider Claims Chart.
09/02/20	J.A. Moe, II	0.20	119.85	B300	In response to the request for review of the injunction and release provisions in the Plan, prepare draft of different claim scenarios in regard to a claimant proceeding or being enjoined.
09/02/20	M. Zeefe	0.50	240.13	B300	Call with BRG, Dentons re effective date claims (0.4); follow up email re union claims (0.1).
09/02/20	S. Maizel	0.50	400.00	B300	Review and respond to emails re Toyon settlement.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	S. Alberts	0.20	160.00	B300	Claims. Review communications concerning claim payments (.1), follow up (.1).
09/03/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of Priority Insurance Claims: Review again the E-Mails on payments, then telephone call to Norman Haslun discussing the payments, then second telephone call to Norman Haslun on payments to Carriers on prepetition benefit plans.
09/03/20	J.A. Moe, II	1.10	659.18	B300	In regard to the SIR on EPL Claims: Exchange E-Mails with Tania Moyron on, and telephone call with Ms. Moyron on, the amount of the SIR and the rationale for the possible payment (.10); review form of the EPL and auxiliary list, on the reserve (.10); telephone calls with Karleen Murphy and Sandra McCandless on adjustments to the Chart on the SIR (.30); additional telephone call with Karleen Murphy reviewing and revising the Charts (.30); additional review and revisions with Karleen Murphy on the Charts, and transmit the SIR Chart to Tania Moyron (.30).
09/04/20	J.A. Moe, II	0.10	59.93	B300	In regard to Non-Tax Priority Claims: Review exchange of E-Mails on meeting on review of Claims.
09/04/20	K.M. Howard	0.40	100.30	B300	Analysis of Stipulation Resolving Claims Asserted by Toyon Associates and reviewed and revised Critical Dates Memorandum accordingly.
<b>Subtotal</b>		<b>211.80</b>	<b>107,293.41</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	S. Maizel	0.60	480.00	B310	Telephone conference with M. Shinderman, etc. re Toyon admin expense motion.
08/05/20	N. Koffroth	0.50	250.75	B310	Call with P. Chadwick, D. Galfus, et al. re administrative and priority claims analysis
08/17/20	C. Montgomery	0.50	400.00	B310	Phone call with S Maizel and T Moyron regarding post effective date Administrative claim payments.
08/18/20	S. Maizel	0.30	240.00	B310	Telephone conference with H. Kevane, etc. re BASM issues.
08/19/20	T. Moyron	0.20	119.85	B310	Analyze amended notice on objection and prepare comment (.1); correspond regarding same (.1).
08/19/20	N. Koffroth	1.00	501.50	B310	Draft notices re objections to Doris Thompson claim (0.6); Racquel Joseph claim (0.4)
08/19/20	G. Medina	0.50	146.63	B310	Call with Dentons and BRG Team re claims reconciliation.
08/19/20	G. Medina	0.80	234.60	B310	Communication with N. Koffroth re filing (0.1); review file and send Notice of Rescheduled Hearing on Debtors' Motion To Disallow Claims and declaration of Service (0.7).
08/20/20	J.A. Moe, II	0.20	119.85	B310	Telephone call from Elina Tilman on Grievance Claims (.10); confer with Karleen Murphy on previous Exhibits on litigation and "claims" associated with St. Vincent, St. Francis and Seton (.10).
08/20/20	K.M. Howard	0.50	125.38	B310	Analysis of Notice of Rescheduled Hearing on Debtors' Motion to Disallow Claim filed by Raquel Joseph and reviewed and revised Critical Dates Memorandum (.4); analysis of the court's notice regarding the rescheduled hearing and reconciled same with Critical Dates Memorandum (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	K.M. Howard	0.50	125.38	B310	Analysis of Notice of Rescheduled Hearing on Debtors' Motion to Disallow Claim filed by Doris Thompson and reviewed and revised Critical Dates Memorandum (.4); analysis of the court's notice regarding the rescheduled hearing and reconciled same with Critical Dates Memorandum (.1).
08/20/20	T. Moyron	0.70	419.48	B310	Conference call with C. Montgomery and analysis re prior 990 and related matters (.1), (.3), (.3).
08/21/20	J.A. Moe, II	0.20	119.85	B310	/Grievance Claims/ Telephone call to Karleen Murphy on List of Grievance Claims
08/24/20	R. Millner	0.30	240.00	B310	Review ORIC claim exhibit and stipulation.
08/27/20	R. Millner	0.20	160.00	B310	Email to R. Richards re claim and claim bar dates under 9th Circuit law.
08/28/20	S. Maizel	0.10	80.00	B310	Review and forward court's order re BASM claims.
08/31/20	S. Maizel	0.40	320.00	B310	Telephone conference with Karl Block, re SCAN issues (.3); telephone conference with H. Kevane re same (.1).
09/01/20	K.M. Howard	0.40	100.30	B310	Analysis of order approving tolling agreement between Debtors and Blue Mountain Capital Management and reviewed and revised Critical Dates Memorandum accordingly.
09/02/20	S. Maizel	1.40	1,120.00	B310	Telephone conference with Karl Block re SCAN claims (.3); telephone conference with H. Kevane re same (.3); review and respond to emails re same (.8).
09/03/20	S. Maizel	0.20	160.00	B310	Telephone conference with H. Kevane re SCAN admin expense issues.
09/03/20	J.A. Moe, II	0.10	59.93	B310	Review Amended Claim filed by Garden Crest Convalescent Hospital.
<b>Subtotal</b>		<b>9.60</b>	<b>5,523.50</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	T. Moyron	14.50	8,689.13	B320	Conference call with J. Schlant and J. Emerson re admin claim reserve and related chart (1.4); conference call with M. Zeefe re SGM brief (.9), (.2); conference call with H. Kevane, BRG, C. Montgomery, et al. re payor and risk pool claims (1.1); prepare P. Chadwick declaration (.3); call with J. Schlant (.1); internal conference call regarding responses to SGM arguments (1.4); call with D. Galfus re plan matters (.5); research in connection with confirmation brief, including section 1129(a)(9), 1129(a)(11) (2.3); research regarding SGM's arguments, including consideration of litigation claims and other SGM arguments (3.8); analyze admin claims chart and related matters (.6); prepare arguments for confirmation brief (.8); analyze outline and provide comments (.5); analyze responsive arguments ; analyze matters related to Chubb (.2); analyze matters related to HealthNet (.2); analyze matters related to Infor (.2).
08/01/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re plan objections.
08/01/20	S. Maizel	1.00	800.00	B320	Drafting reply to SGM opposition to confirmation re offset and recoupment.
08/01/20	S. Maizel	0.80	640.00	B320	Review and respond to email from C. Montgomery re SGM arguments on setoff and recoupment.
08/01/20	M. Zeefe	8.30	3,986.08	B320	Review SGM confirmation objection (0.1); calls with T. Moyron re SGM arguments and cases (1.3); continue reviewing/researching cases (2.8); Dentons call re same (1.4); follow up call with T. Moyron (0.3); call with T. Koshak re research (0.4); emails with team (0.1); draft introduction and outline of reply (1.2); calls with T. Moyron re same (0.7).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	R. Richards	3.60	2,602.80	B320	Call re SGM plan confirmation objection (1.3); review SGM confirmation objection (0.7); review outline chart (0.3); review Toyon objection (0.3); review key portions of Jevic decision (0.3); review plan and draft insert responding to SGM on Jevic (0.4), review SGM counterclaims (0.2), emails re releases (0.1).
08/01/20	S. Martin	0.80	608.60	B320	Research and confer with debtors' counsel regarding SGM objection and claim.
08/01/20	T. Koshak	3.60	1,545.30	B320	Reading and analyzing cases disseminated in furtherance of participating in strategy call with case team regarding responses to Strategic Global Management's Objections to confirmation of our client's Chapter 11 Plan (1.9); phone conference and strategy with case team (1.4); follow-up conversation with Malka Zeefe regarding initial research containing the relevant facts at issue (.3).
08/01/20	N. Koffroth	5.90	2,958.85	B320	Draft confirmation brief in support of joint chapter 11 plan
08/01/20	J.A. Moe, II	0.30	179.78	B320	In regard to Objections to the Plan: Exchange E-Mails with and telephone call to Nick Koffroth on analysis of Chubb Insurance Objection (.20); return telephone call to Nick Koffroth on Geoffrey Miller's analysis of Chubb insurance Objection and the provisions of the Plan (.10).
08/01/20	J.A. Moe, II	0.30	179.78	B320	In regard to Objections to the Plan: Exchange E-Mails with Tania Moyron on Objection of Infor (US) Inc., and preliminarily review the Objection..
08/01/20	L. Whidden	7.60	5,817.80	B320	Conference call with Tania Moyron re: declarations in support of plan feasibility (.2); conference call with C Montgomery re: structure of declaration and topics to be addressed (.5); review plan sections on reserves (.7); review Toyon and SGM Objections to feasibility and key cases cited therein (1.9); participate on call with team members re: responses to objections to claims and evidentiary support for same (1.5); begin drafting of CFO declaration in support of confirmation (1.7); review

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					administrative claim cases and pending litigation treatment in plans (1.1)
08/01/20	G. Miller	0.30	132.60	B320	Revise amended plan to incorporate certain comments from Chubb.
08/02/20	G. Miller	1.60	707.20	B320	Revise Chubb comments and email Chubb re same.
08/02/20	M. Zeefe	8.20	3,938.05	B320	Draft portion of confirmation brief responding to SGM objection (7.7); calls with T. Moyron re same (0.5).
08/02/20	S. Schrag	2.10	705.60	B320	Confer with T. Moyron regarding research to objection to plan (.2); conduct research in support of response to objection to plan (1.9).
08/02/20	N. Koffroth	7.20	3,610.80	B320	Draft confirmation brief in support of joint chapter 11 plan
08/02/20	C. Montgomery	6.70	5,360.00	B320	Communications with T Moyron and S Maizel regarding response to plan objections (.5); drafting feasibility response presentations and analysis and communications and phone calls with L Whidden re same (1.9); phone conference with P Chadwick, T Moyron, J Emerson regarding Chadwick declaration (.6); follow up call with L Whidden (.1); phone conference with T Moyron regarding necessary approach to Chadwick Declaration (.3); further review and revisions to Chadwick Declaration (3.3)
08/02/20	T. Koshak	4.20	1,802.85	B320	Reading and analyzing SGM's Objections to Confirmation of Verity's Chapter 11 Plan, reading and analyzing Plaintiff's Motion to Dismiss SGM's Counterclaims or Strike Portions of SGM's Counterclaims (1.2); performing legal research regarding litigation over a disallowed claim and its effect on confirming a Chapter 11 plan in the Ninth Circuit (1.3); performing additional research into case law cited in SGM's Objections to identify contrary case law or distinguish those cases from the instant action (1.7).
08/02/20	A. Ring	6.40	2,448.00	B320	Review Confirmation Objection (1.5); research cases related to disgorgement of payments (4.9).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	R. Richards	4.40	3,181.20	B320	Review confirmation order models (0.8), review docket re plan pleadings to date (0.3), work on draft of confirmation order (2.9), discuss research with associate on GRM objection (0.2), emails re confirmation responses (0.2).
08/02/20	T. Moyron	6.40	3,835.20	B320	Conference call with BRG, C. Montgomery, et al. re declaration and feasibility (.6); conference call with C. Montgomery and L. Whidden re same (.3); conference call with M. Shinderman and S. Maizel re Toyon (.6); call with H. Levy Biehl, H. Kevane, S. Maizel re HealthNet and AG (.8); analyze and prepare responses to objection and analyze issues related thereto re confirmation (3.7); analyze matters related to Chubb and revised proposed plan language (.4).
08/02/20	T. Moyron	0.60	359.55	B320	Analyze J. Schlant email and attachment (.2); conference call with J. Schlant (.3); prepare email to J. Schlant, et al. re admin claim exhibit (.1).
08/02/20	S. Martin	0.30	228.23	B320	Communicate with debtors' counsel regarding response to SGM objection.
08/02/20	R. Millner	0.20	160.00	B320	Review draft memo to Chubb re plan revisions and response to Chubb proposal.
08/02/20	R. Millner	0.20	160.00	B320	Telecon N. Koffroth to review and revise transmittal to Chubb.
08/02/20	J.A. Moe, II	0.10	59.93	B320	In regard to Objections to the Plan, review exchanges of E-Mails with Robert Millner and Geoffrey Miller, on responding to Chubb Insurance.
08/02/20	J.A. Moe, II	1.10	659.18	B320	In regard to the Objections to the Plan, review the Objection to the Plan filed by Infor (US) Inc., and identify the previous Objections filed by Infor (US) Inc..(.20); review previous "Objections" filed by Infor (US) Inc., and the Debtors' pleadings on assumption and assignment of contracts, including contracts with Infor (US) Inc. (.90).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	L. Whidden	8.10	6,200.55	B320	Work on Chadwick Declaration on feasibility and in Support of Confirmation (5.6); call with BRG to go over reserve charts (.6); conference call with C Montgomery re: same (.3); team call re: status of declaration (.2); follow up call with C Montgomery re: corrections to sections of Declaration re: reserves (.2); revise and further address Toyon and SGM feasibility sections in Declaration (1.2)
08/02/20	N. Koffroth	1.40	702.10	B320	Internal call re plan objections (0.5); internal call re Chadwick Declaration in support of confirmation (0.6); participate in internal call re administrative claims reserve (0.3)
08/03/20	N. Koffroth	2.90	1,454.35	B320	Participate in internal call re administrative claims reserve (0.2); participate in call with P. Chadwick, D. Galfus, et al. re administrative claims reserve (1.6); participate in call with J. Schlant, J. Emerson, et al. re administrative claims reserve (1.1)
08/03/20	T. Moyron	3.60	2,157.30	B320	Analyze email from P. Saba, et al. re extension and stipulation (.2); correspond with J. Emerson re admin claims (.1); exchange emails with J. Schlant, et al. re admin claims (.4) and analyze various charts and matters regarding same (.6); correspond with counsel for Prime re language in order (.1); correspond with counsel for Chubb (.1); correspond regarding P. Chadwick declaration (.1); analyze H. Kevane emails and resolution re Aetna, Cigna (.3); analyze matters related to draft order (.2); correspond regarding United objection (.2); analyze T. Schroeder re cost report (.1); analyze email from P. Ricotta re status on various matters (.1); analyze additional plan objections (.3); analyze T. Conner email re accounts (.1); analyze matters related to SGM's argument and responses and cases (.3); analyze response to Toyon objection and language for declaration (.2); analyze matters related to memorandum in support of confirmation (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	T. Moyron	0.80	479.40	B320	Conference call with N. Koffroth re POL and sale matters and related pleadings.
08/03/20	T. Moyron	0.30	179.78	B320	Conference call with M. Zeefe re SGM objection.
08/03/20	G. Miller	0.20	88.40	B320	Call with D. McGehrin re debtors responses to Chubb plan comments.
08/03/20	A. Ring	3.20	1,224.00	B320	Further research into cases regarding disgorgement of payments.
08/03/20	C. Montgomery	6.10	4,880.00	B320	Resume revisions to Chadwick Declaration, including waterfall revisions and communications with L Whidden re same (6.1);
08/03/20	S. Maizel	2.80	2,240.00	B320	Telephone conference with P. Chadwick re Toyon objection to confirmation (.3); drafting reply to Toyon objection to confirmation (2.5).
08/03/20	S. Maizel	1.00	800.00	B320	Telephone conference with Paul Ricotta re plan confirmation issues.
08/03/20	T. Koshak	7.80	3,348.15	B320	Continuing legal research into case law progeny of In re Pizza of Hawaii and In re Harbin to evaluate how subsequent courts have interpreted and applied the principles therein (2.8); performing additional research into who bears the burden under 1129(a)(9) and 1129(a)(11) (.9); performing research into whether SGM satisfied its burden to make an administrative expense claim (2.9); phone conference and discussion with Malka regarding the results of research (.8); sending Malka annotated cases discussed (.4).
08/03/20	R. Richards	4.60	3,325.80	B320	Review disclosure statement order (0.5); follow up with KCC on solicitation package service declaration (0.2); revise and circulate confirmation order (1.3); review cases on attorney fee disgorgement (2.1); draft insert re same (0.3); review revised admin claims chart (0.2).
08/03/20	N. Koffroth	12.80	6,419.20	B320	Draft confirmation brief in support of joint chapter 11 plan

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	L. Whidden	7.80	5,970.90	B320	Review waterfall chart; settlement agreements and objections to confirmation (2.3); conference call with C Montgomery re: Chadwick declaration in support of confirmation and team views re: required information for declaration and additional reserves (.5); review revised chart of reserves and claims filed (.5); further conference call with C Montgomery re: declaration (.2); work on declaration in support of confirmation and revisions to same (3.3)
08/03/20	K.M. Howard	0.30	75.23	B320	Analysis of emails regarding plan supplement documents and reviewed and revised Critical Dates Memorandum.
08/03/20	K.M. Howard	0.40	100.30	B320	Analysis of second stipulation between Verity and Integrity Healthcare continuing deadlines related to confirmation objection and reviewed and revised Critical Dates Memorandum.
08/03/20	M. Zeefe	12.20	5,859.05	B320	Continue drafting confirmation brief response to SGM objection (10.6); calls with T. Moyron re same (1.3); calls with N. Koffroth re same (0.3).
08/03/20	J.A. Moe, II	1.50	898.88	B320	In regard to Objections to the Plan, review and respond to Peter Chadwick's information on Infor (US) Inc., and its Limited Objection, in the context of assumption and assignment of Software Agreement (.10); review and revise language of insert for the Plan (. 20); telephone call to and E-Mail to Chris Petersen (.10); exchange E-Mails with and preliminary telephone call to Brenda Buchas on Objection (.10); telephone call with Toni Guilfoyle on status of Software Agreements (.20); conference telephone call with Brenda Cuchas and Jon Emerson on requirement for Software (.30); telephone call returned to Tania Moyron on likely agreement with Infor (US) Inc. (.10); prepare draft Stipulation on agreement between Debtors and Infor (US) Inc. (.30); revise first draft of insert for Order on the Plan (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	M. Zeefe	14.20	6,819.55	B320	Continue drafting confirmation brief response to SGM objection (12.0); call with N. Koffroth re same (0.1); call with C. Montgomery re same (0.3); calls with T. Moyron re same (1.8).
08/04/20	L. Macksoud	5.20	2,276.30	B320	Research feasibility issues for liquidating plan in CA bankruptcy courts and 9th circuit, draft summary and analysis of same and confer with T. Moyron re same.
08/04/20	S. Martin	2.20	1,673.65	B320	Attention to P. Chadwick declaration and response to SGM's objection, and communicate with debtors' counsel regarding same.
08/04/20	T. Koshak	4.30	1,845.78	B320	Continuing legal research regarding administrative claim request (2.2); related plan standards (.8); and bad-faith claims (1.3).
08/04/20	S. Maizel	1.70	1,360.00	B320	Attend to issues related to the reply to the objections to confirmation.
08/04/20	S. Maizel	0.90	720.00	B320	Telephone conference with C. Montgomery, etc. re objections to confirmation issues.
08/04/20	L. Whidden	6.90	5,281.95	B320	Work on Declaration in support of feasibility and plan confirmation
08/04/20	C. Montgomery	11.40	9,120.00	B320	Communications re T. Moyron regarding confirmation support issues (1.0.); continued drafting of Chadwick Declaration (8.2); phone conferences with L Whidden re same (1.0); phone calls with T Moyron re same (.2); phone call with M Zeefe re same (.3); phone call with J Moe re same(.5); communications with S Maizel and T Moyron re litigation estimates (.2);
08/04/20	N. Koffroth	13.60	6,820.40	B320	Draft confirmation brief in support of joint chapter 11 plan
08/04/20	T. Moyron	2.10	1,258.43	B320	Analyze and prepare confirmation brief (.9); analyze and prepare confirmation brief (1.1); correspond with J. Schlant regarding administrative claim analysis (.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	T. Moyron	4.00	2,397.00	B320	Analyze J. Schlant email re administrative claims (.1); conference call regarding administrative claims and illustration for Court (1.3); analyze illustration (.2); analyze and prepare response re SGM (1.6); conference call with S. Martin regarding counterclaim and request for interest and fees (.8).
08/04/20	N. Koffroth	2.70	1,354.05	B320	Participate in internal call re Chadwick Declaration in support of confirmation brief (1.3); participate in internal call re administrative claims reserve analysis (1.4)
08/04/20	T. Moyron	3.70	2,217.23	B320	Attend to matters related to Plan and further prepare and analyze matters related to confirmation brief and responding to objections.
08/05/20	S. Martin	1.10	836.83	B320	Prepare response to SGM's objection to plain and related communications.
08/05/20	T. Moyron	8.40	5,033.70	B320	Analyze and prepare P. Chadwick declarations and updated versions (2.3); analyze and prepare response to SGM's objection(1.4); analyze and prepare confirmation brief and analyze related matters (2.8); analyze and provide comments on reserve charts (.6); analyze and prepare confirmation order (1.3).
08/05/20	S. Maizel	2.50	2,000.00	B320	Drafting inserts for and revising confirmation brief.
08/05/20	T. Koshak	3.60	1,545.30	B320	Completing legal research related to whether the timing of the notice of administrative expense claim was untimely or showed bad faith, and any standards that must be met to substantiate (2.6); performing additional legal research regarding what pre-judgment interest is permitted in breach of contract litigation governed by California law which would be included in a bankruptcy claim in a Bankruptcy Court for the Central District of California (1.0).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	R. Richards	2.70	1,952.10	B320	Review comments on confirmation order (0.2); review KCC solicitation package service affidavit (0.3); review newly filed confirmation objections (0.5); revise confirmation order (1.5); review language insert from Jones Day (0.1); emails re insert for confirmation brief (0.1).
08/05/20	L. Whidden	7.70	5,894.35	B320	Conference call with C Montgomery, Tania Moyron, John Moe and BRG re: feasibility charts (.5); follow up call with C Montgomery re: same (.3); review revised charts and compare information in Disclosure Statement and filed claims chart incorporate information into declaration in support of confirmation (2.4); review settlement section and insert to Declaration (.6); confer with C Montgomery re: objections to confirmation (.2); review reserves chart as revised and comments to C Montgomery (.5) review brief in support of confirmation (.9); work on factual information regarding reserve and settlement sections in declarations in support of confirmation and finalizing of same (2.3)
08/05/20	T. Moyron	6.60	3,955.05	B320	Conference calls with J. Schlant (.4), (.2), (.4); re reserves, P. Chadwick declaration and amounts related thereto; analyze, prepare and finalize confirmation brief, responses to objections and declarations in support thereof (4.7); call with M. Zeefe re cases law and response re SGM (.8); conference call with P. Chadwick (.1).
08/05/20	N. Koffroth	17.20	8,625.80	B320	Draft confirmation brief in support of Second Amended Joint Plan of Liquidation (15.8); draft Chadwick Declaration in support of confirmation brief (1.4)
08/05/20	J.A. Moe, II	0.10	59.93	B320	/SCAN Health/ Review E-Mails from Dan Besikoff on Limited Objection to the Plan.
08/05/20	J.A. Moe, II	0.40	239.70	B320	In regard to the tabulation of votes, review the Declaration Of Andres Estrada and the Tabulation, and E-Mail to Dentons' team on approval (.30); exchange E-Mails on filing Declaration and Tabulation (.10).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	J.A. Moe, II	0.70	419.48	B320	In regard to Objection to the Plan, filed by Info (US) Inc., review Tori Guilfoyle's comments to the proposed language for the confirmation Order, and E-Mail in response to the proposed changes (.10); telephone call from Nick Koffroth on likely resolution (.10); telephone call with Tori Guilfoyle on proposed resolution (.10); revise the proposal (.10); exchange E-Mails with Ms. Guilfoyle and review revised insert for Order (.20); E-Mail to Tania Moyron and Nick Koffroth on proposed insert (.10).
08/05/20	C. Montgomery	12.90	10,320.00	B320	Continued Preparation of Chadwick Declaration (9.6); communications with T Moyron and S Martin re same (.1); phone call T Moyron re administration claims exhibit (.6); participate in conference call with J Emerson, L Whidden , G Medina S Maizel regarding administrative claims exhibit (.5)communication with J Emerson re exhibits (.1); phone calls with L Whidden regarding declaration (.6); phone calls with T Moyron re declaration (1.4) ;
08/05/20	M. Zeefe	15.10	7,251.78	B320	Revise confirmation brief re response to SGM (9.9); calls with N. Koffroth re same (0.5); calls with T. Moyron re same (1.0); revise plan settlement agreement as confirmation brief exhibit (0.7); review emails re Toyon response (0.2); review confirmation brief (2.8).
08/06/20	J.A. Moe, II	0.10	59.93	B320	In regard to Objections to the Plan, review exchange of E-Mails on responses to the proposed Plan filed by Long Beach Memorial Medical Center and GRM, and response to the Objections.
08/06/20	N. Koffroth	5.90	2,958.85	B320	Draft omnibus response to certain plan confirmation objections
08/06/20	R. Richards	2.10	1,518.30	B320	Prepare response to Long Beach Memorial limited objection (0.7); review relevant portions of Confirmation Memorandum of Law for same (0.6); review contractual documents for response to GRM Information systems objection (0.8).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	C. Montgomery	1.60	1,280.00	B320	Overnight phone call regarding Chadwick declaration (.1); communications with D Galfus, M Zeefe , T Moyron re same (.1); review confirmation brief (.6) ; phone call with T Moyron re same (.2); communications with T Moyron regarding Premier objection to confirmation (.6);
08/06/20	T. Moyron	1.80	1,078.65	B320	Analyze objections from AppleCare, United, GRM, SCAN and Long Beach Memorial (1.2); exchange emails with P. Chadwick re GRM (.2); exchange emails with H. Kevane re same (.2); exchange further emails re same (.2),
08/06/20	T. Moyron	0.50	299.63	B320	Calls with D. Galfus (.3) and follow up (.2) re Plan, Dec and supplemental exhibit and other matters.
08/06/20	S. Martin	0.60	456.45	B320	Review the debtors' response to plan objections, as it pertains to SGM.
08/06/20	T. Moyron	0.70	419.48	B320	Further analysis of additional objections and reply and coordinate and correspond regarding same with H. Kevane, C. Montgomery, et al.
08/07/20	N. Koffroth	4.60	2,306.90	B320	Draft omnibus reply to certain confirmation objections and in support of plan
08/07/20	N. Koffroth	1.10	551.65	B320	Draft stipulations and orders continuing confirmation objection deadlines (i) SCAN (0.3), (ii) GRM (0.2), (iii) AppleCare (0.2), and (iv) UnitedHealthcare (0.4)
08/07/20	L. Whidden	0.20	153.10	B320	Review Blue Cross Objection to Plan
08/07/20	S. Maizel	0.10	80.00	B320	Review Toyon evidentiary objection.
08/07/20	G. Medina	1.80	527.85	B320	Assisted N. Koffroth review file and upload stipulations re Continuing Reply Deadline Related To Confirmation Objection (1.0); Assisted N. Koffroth review and file Certain Objections To Confirmation of Second Amended Joint Chapter 11 Plan (0.8).
08/07/20	C. Montgomery	4.80	3,840.00	B320	Prepare response to Premier confirmation objection and communications with N Koffroth and T Moyron re same.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	R. Richards	2.40	1,735.20	B320	Review KCC voting declaration (0.3); review email chain re Aetna stipulation (0.2); review and circulate confirmation order (1.0); draft insert response to GRM confirmation objection (0.6); review proposal from GRM to resolve its objection (0.3).
08/07/20	K.M. Howard	0.40	100.30	B320	Analysis of stipulation and order continuing reply deadline related to GRM Information Management's confirmation objection and reviewed and revised Critical Dates Memorandum.
08/07/20	K.M. Howard	0.40	100.30	B320	Analysis of order and stipulation continuing Debtors' reply deadline to United Healthcare's Confirmation Objection and reviewed and revised Critical Dates Memorandum.
08/07/20	K.M. Howard	0.20	50.15	B320	Analysis of Notice of Resolution of Cigna's confirmation objection and reconciled with Critical Dates Memorandum.
08/07/20	J.A. Moe, II	0.40	239.70	B320	In regard to the proposed Order on confirmation of the Plan, exchange E-Mails with Bob Richards on and review language in Order as proposed by Infor (US) Inc., and the Debtors on continuing contract with the Debtors to December 31st (.20); review Order with insert (.10); telephone call to Tori Guilfoyle on inclusion of language on Infor (US) Inc. in Confirmation Order (.10).
08/08/20	M. Zeefe	0.70	336.18	B320	Call with N. Koffroth re confirmation issues (0.1); team call re same (0.6).
08/08/20	T. Moyron	2.50	1,498.13	B320	Conference call with counsel for AppleCare and United re objections to plan (.8); analyze BlueShield objection (.1); call with R. Adcock, BRG, H. Kevane, et al. re payor objections (.4); call regarding BlueShield (.6); further analysis regarding United and AppleCare objections and resolution (.2); analyze matters related to standing and defenses re admin claims (.4).
08/08/20	S. Maizel	0.40	320.00	B320	Telephone conference with H. Kevane, etc. re United Objection to confirmation.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/20	S. Maizel	0.60	480.00	B320	Telephone conference with BRG, etc. re late filed objections to confirmation.
08/08/20	S. Maizel	0.50	400.00	B320	Telephone conference with H. Kevane re Omnicare objection to confirmation.
08/08/20	S. Maizel	0.20	160.00	B320	Review and respond to emails re post-confirmation prosecution of causes of action.
08/08/20	S. Martin	0.90	684.68	B320	Review and respond to objections to P. Chadwick declaration.
08/08/20	A. Ruegger	0.40	320.00	B320	Review T. Moyron objection to confirmation hearing evidence, and communications with T. Moyron, S. Maizel and S. Martin re: same.
08/08/20	N. Koffroth	0.60	300.90	B320	Participate in internal call re confirmation objections filed following stipulated extensions
08/09/20	T. Moyron	0.60	359.55	B320	Analyze and correspond re additional objections re plan (.3); analyze plan matters (.3).
08/09/20	S. Maizel	0.20	160.00	B320	Telephone conference with H. Kevane re Omnicare objection, etc.
08/09/20	S. Maizel	0.60	480.00	B320	Telephone conference with Karl Block re SCAN objection (.2); review and respond to emails re same (.4).
08/09/20	S. Maizel	0.40	320.00	B320	Telephone conference with T. Moyron, etc. re objections to confirmation (x2).
08/09/20	S. Maizel	0.20	160.00	B320	Telephone conference with Malka Zeefe re objections to confirmation.
08/09/20	S. Maizel	0.60	480.00	B320	Review and respond to emails re omnibus reply to objections to confirmation.
08/09/20	T. Moyron	1.40	838.95	B320	Analyze issues related to payor objections (.4); analyze H. Kevane insert (.2); prepare and finalize omnibus reply (.8).
08/09/20	M. Zeefe	1.90	912.48	B320	Draft reply re payor objections (0.3); calls with S. Maizel re same (0.1); draft reply re GRM objection (0.4); revise reply (1.0); calls with T. Moyron re same (0.1).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	M. Zeefe	4.60	2,209.15	B320	Call with T. Moyron re plan settlement agreement (0.1); emails re same (0.2); review SGM surreply (0.4); team call re same (0.3); draft response to same (3.2); call with T. Moyron re same (0.2); call with N. Koffroth re same (0.1); review other confirmation tasks (0.1).
08/10/20	C. Montgomery	2.10	1,680.00	B320	Communications with T Moyron and R Adcock regarding Post effective date directors (.3); review pleadings files regarding responses to supplemental objection and communications with T Moyron re same (.3); review SGM supplemental objection(.5); phone conference with T Moyron, S Maizel, M Zeefe and S Martin regarding same and counter responses (.5); review debtors Reply in support of confirmation (.5)
08/10/20	G. Medina	2.70	791.78	B320	Communication with N. Koffroth regarding filings (0.2) review and file stipulation HPSM Settlement Stipulation and upload order (0.4); assist in preparation and filings of Supplemental Proposed Resolution of Objections Asserted By Certain Payors and Debtors Request To Strike or, In The Alternative, Overrule Strategic Global Management, Inc's Unauthorized Surreply In Support of SGM Confirmation Objection and (1.8); download and send efiled copies to team (0.3).
08/10/20	T. Moyron	1.80	1,078.65	B320	Conference call with H. Kevane and S. Maizel re AppleCare (.5); conference call with counsel for AppleCare, H. Kevane, et al. (.8);conference call with R. Adcock and H. Kevane re AppleCare (.3); conference call with S. Maizel and K. Kevane re AppleCare (.2).
08/10/20	S. Martin	0.50	380.38	B320	Review SGM's reply in support of opposition to confirmation and communicate with T. Moyron regarding same.
08/10/20	T. Moyron	0.40	239.70	B320	Conference call with N. Koffroth re coordination and finalization of outstanding plan and sale documents.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	T. Moyron	1.50	898.88	B320	Analyze correspondence from K. Block and other payors re proposed language (.3); prepare emails regarding same (.3); analyze updated language for confirmation order (.2); analyze amended confirmation order and prepare same (.4); analyze matters related to updated plan (.3).
08/10/20	K.M. Howard	0.40	100.30	B320	Analysis of Third Stipulation Continuing Reply Deadline to Applecare's Confirmation Objection and reviewed and revised Critical Dates Memorandum.
08/10/20	S. Maizel	0.10	80.00	B320	Telephone conference with Nick Koffroth re payor issues with regard to plan objections.
08/10/20	S. Maizel	0.40	320.00	B320	Telephone conference with T. Moyron re pending issues re confirmation (X3).
08/10/20	S. Maizel	1.40	1,120.00	B320	Telephone conference with H. Kevane, etc. re Applecare issues (.6); t/c with Counsel for Applecare re issues (.4); telephone conference with BRG, R. Adcock, etc. re Applecare (.4).
08/10/20	S. Maizel	0.40	320.00	B320	Telephone conference with BRG, R. Adcock, etc re pending sales issues.
08/10/20	S. Maizel	0.70	560.00	B320	Drafting insert to motion to strike SGM surreply.
08/10/20	S. Maizel	0.30	240.00	B320	Review and respond to inquiry from N. Koffroth re payor claim resolutions
08/10/20	R. Richards	0.90	650.70	B320	Revise Liquidating Trust Agreement (0.4), review and comment on revised confirmation order (0.5).
08/10/20	T. Moyron	2.30	1,378.28	B320	Analyze and prepare motion to strike, related inserts and response to evidentiary objections.
08/10/20	N. Koffroth	6.20	3,109.30	B320	Draft supplement to confirmation brief re proposed resolution of payor objections (1.8); draft response to SGM surreply and Toyon evidentiary objections (4.4)
08/10/20	N. Koffroth	2.10	1,053.15	B320	Draft notice of plan supplements (1.2); draft and revise plan of liquidation (0.9)
08/10/20	N. Koffroth	1.20	601.80	B320	Draft internal memorandum re outstanding plan and sale issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	N. Koffroth	0.50	250.75	B320	Draft stipulation and order resolving Swinerton Builders informal plan objection
08/10/20	T. Moyron	0.80	479.40	B320	Analyze SGM sur-reply (.3); analyze updated response re payors and correspond regarding same (.2); analyze conditions precedent to effective date (.2); prepare email re same (.1).
08/10/20	T. Moyron	0.70	419.48	B320	Analyze and prepare payor resolution supplement (.4); analyze related correspondence (.2); analyze related timeline (.1).
08/11/20	S. Martin	0.40	304.30	B320	Review tentative ruling confirming plan and confer with fellow counsel regarding same.
08/11/20	T. Moyron	1.70	1,018.73	B320	Analyze AppleCare proposed agreement and related agreement (.8); analyze E. Goldstein, H. Kevane, et al., emails re same (.4); analyze proposed filing and updated filing (.3); conference call with R. Adcock re same (.1); conference call with S. McCandless re labor matters (.1).
08/11/20	T. Moyron	0.60	359.55	B320	Analyze tentative rulings on Plan, motion to reject, and motion to enforce sale order re AG.
08/11/20	T. Moyron	5.20	3,116.10	B320	Analyze and prepare confirmation and analyze redlines (2.7); analyze amended plan and redlines (1.4); conference calls with C. Montgomery re Premier (.7), (.1); correspond with Mintz re LT supplement (.1); analyze correspondence with counsel for Swinerton and stipulation resolution and prepare email re same (.2).
08/11/20	T. Moyron	2.70	1,617.98	B320	Conference call with J. Schlant re 15.3 Exhibit (.1); conference call with D. Galfus (.1), P. Chadwick (.1), H. Kevane (.1), (.3); R. Adcock (.2), D. Bleck (.1), (.2); analyze J. Schlant, et al. emails re various claimants and amounts (.3); exchange emails with Committee counsel re AppleCare (.1); analyze issues related to amend plan and amended order and redlines (.4); conference call with J. Schlant re updating Section 15.3 exhibit for filing (.7).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	R. Richards	1.80	1,301.40	B320	Review insurance related provisions in Second Amended Plan and Disclosure Statement (1.1); review key portions of court's tentative rulings (0.7).
08/11/20	S. Maizel	0.10	80.00	B320	Telephone conference with T. Moyron re responsible person determination.
08/11/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re confirmation issues.
08/11/20	C. Montgomery	5.40	4,320.00	B320	Review supplemental response regarding Payor agreements (.3); review update section 15.3 reserves estimate and communications with T Moyron, H Kevane re same (1.6); communications with T Moyron and regarding Premier objection (.5); review tentative decision on confirmation (.5); phone call with F Neufeld and T Moyron regarding Premier objection (.3); communications with T Moyron re possible resolution of same (.7); communications regarding Swinerton resolution (.1) ; multiple evening phone calls with T Moyron and F Neufeld regarding resolution of Premier issues (1.4)
08/11/20	S. Maizel	0.30	240.00	B320	Telephone conference with H. Kevane, etc. re confirmation order draft.
08/11/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, etc. re Nantworks issues.
08/11/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron (x2) re confirmation issues.
08/11/20	S. Maizel	0.20	160.00	B320	Telephone conference with Karl Block, etc. re SCAN confirmation issues.
08/11/20	S. Maizel	0.30	240.00	B320	Review court's tentative on confirmation of plan.
08/11/20	S. Maizel	0.20	160.00	B320	Review and respond to emails re Swinerton stipulation.
08/11/20	N. Koffroth	3.60	1,805.40	B320	Draft modified second amended plan
08/11/20	N. Koffroth	3.90	1,955.85	B320	Draft supplement re AppleCare settlement, plan, and section 15.3 exhibit

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	J.A. Moe, II	1.20	719.10	B320	Telephone call from Tania Moyron, then review and compare revisions to the Plan Of Liquidation to Geoffrey Miller's proposed changes relating to Chubb Insurance (1.10); E-Mails on one change and one E-Mail on approval of the revisions (.10).
08/11/20	J.A. Moe, II	0.20	119.85	B320	Preliminarily review Judge Robles' Tentative Ruling approving the Plan Of Liquidation.
08/11/20	M. Zeefe	0.80	384.20	B320	Review tentative ruling on confirmation (0.4); call with N. Koffroth re confirmation hearing preparation (0.1); email to S. Maizel re same (0.2); address other confirmation issues (0.1).
08/12/20	M. Zeefe	5.20	2,497.30	B320	Call with T. Moyron, S. Maizel, and N. Koffroth re confirmation (0.4); call with T. Moyron re same (0.1); review modified tentative ruling (0.1); draft confirmation order appendix - confirmation notice (0.6); draft confirmation order appendix - effective date notice (0.6); draft confirmation order appendix - rejection notice (0.4); attend confirmation hearing telephonically (2.7); follow up call with N. Koffroth (0.3).
08/12/20	C. Montgomery	7.00	5,600.00	B320	Communications with T Moyron and S Maizel regarding SGM plan objection (.2); communications with T Moyron regarding plan revisions, plan order and review same (.9); communications regarding modified order relating to Premier (.2); communications with P Chadwick and H Kevane regarding Anthem Blue Cross objection (.4); phone calls and Communications with T Moyron, Fred Neufeld, P Chadwick and D Galfus re Premier (.4); attend and participate in confirmation hearing (3.8); follow up call re confirmation order with T Moyron (.4) ; communications with T Moyron regarding suggested language in confirmation order regarding section 15.3 reserves (.7)
08/12/20	K.M. Howard	0.10	25.08	B320	Analysis of stipulation between Debtors and Swinerton Builders resolving confirmation objection issues.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	K.M. Howard	0.10	25.08	B320	Analysis of order approving stipulation between debtors and Swinerton Builders resolving confirmation objection to determine any additional requirements set by the court.
08/12/20	N. Koffroth	3.60	1,805.40	B320	Attend hearing re plan confirmation and attorney general motion
08/12/20	N. Koffroth	1.40	702.10	B320	Draft confirmation order
08/12/20	G. Medina	9.10	2,668.58	B320	Assist, M. Zeefe, N. Koffroth and T. Moyron review and file numerous pleadings related to confirmation hearing (4.4) Pull and send all Plan related pleadings to T. Moyron, S. Maizel and N. Koffroth in preparation for Confirmation hearing (0.6). Attend confirmation hearing telephonically (3.6). Attend Prime/Verity - Call regarding closing checklist (0.5).
08/12/20	S. Martin	4.20	3,195.15	B320	Communications with fellow counsel regarding modified plan language (.2); attend plan confirmation hearing and confer with fellow counsel regarding same (3.4); review order confirming plan and confer with T. Moyron regarding same (.6).
08/12/20	R. Richards	0.60	433.80	B320	Review confirmation order exhibits.
08/12/20	S. Maizel	2.90	2,320.00	B320	Telephone conference with T. Moyron, etc. re confirmation hearing issues (.2); prep for confirmation hearing (1.0); participate in confirmation hearing (1.7).
08/12/20	T. Moyron	6.10	3,655.43	B320	Analyze cases and prepare for hearing (2.4); participate in confirmation hearing, motion to reject, etc. (3.5); analyze AG Order (.1); analyze J. Richlin email and comments on AG order and reply to same (.1).
08/12/20	S. Maizel	0.40	320.00	B320	Review and revise draft confirmation order.
08/12/20	T. Moyron	1.40	838.95	B320	Analyze and prepare confirmation order and analyze related correspondence and matters.
08/13/20	M. Zeefe	3.10	1,488.78	B320	Review and revise draft confirmation order for lodging (2.7); calls with N. Koffroth re same (0.2); calls with T. Moyron re same (0.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	N. Koffroth	4.90	2,457.35	B320	Draft confirmation order
08/13/20	C. Montgomery	0.10	80.00	B320	Phone call from R Adcock regarding confirmation order question
08/13/20	K.M. Howard	0.40	100.30	B320	Reviewed Order regarding Modified Second Amended Joint Plan (.1); prepared Notice of Lodgment (.2); prepared email to Verity Team (.1).
08/13/20	K.M. Howard	0.40	100.30	B320	Analysis of amended tentative ruling regarding the Second Amended Joint Plan of Liquidation to determine additional deadlines and requirements set by the court.
08/14/20	J.A. Moe, II	0.10	59.93	B320	Preliminarily review Order on Modified Second Amended Joint Plan Of Liquidation, reviewing section of the Order on Infor (US) Inc.
08/14/20	C. Montgomery	0.70	560.00	B320	Review confirmation order as entered (.4) ; communications with T Moyron re same (.3)
08/14/20	N. Koffroth	0.60	300.90	B320	Draft notice of confirmation order
08/14/20	M. Zeefe	0.10	48.03	B320	Call with T. Moyron re confirmation.
08/14/20	S. Maizel	0.10	80.00	B320	Review and revise notice of confirmation.
08/15/20	M. Zeefe	0.70	336.18	B320	Revise and circulate plan settlement agreement (0.6); call and emails with T. Moyron re same (0.1).
08/15/20	T. Moyron	0.90	539.33	B320	Call with M. Zeefe regarding RPHE letter and Plan settlement (.6); analyze final versions (.2); analyze related emails (.1).
08/15/20	N. Koffroth	2.70	1,354.05	B320	Draft response to SGM motion to reconsider confirmation order
08/16/20	N. Koffroth	3.50	1,755.25	B320	Draft response to SGM motion to reconsider confirmation order
08/16/20	C. Montgomery	1.10	880.00	B320	Communications with T Moyron and S Martin and review of SGM objection to confirmation order.
08/16/20	S. Martin	1.00	760.75	B320	Review and comment on SGM's objection to plan and draft response, communicate with debtors' counsel regarding same.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/16/20	T. Moyron	2.80	1,677.90	B320	Analyze and prepare response to SGM's limited objection and calls regarding same.
08/17/20	J.A. Moe, II	0.50	299.63	B320	Review Nick Koffroth's E-Mail on necessity to publish Notice in the Chronicle and Times, and date, then review E-Mails exchanged with Nick Koffroth and Andres Estrada on publication of Notice Of Confirmation (.30); review Notice Of Confirmation Of Joint Second Amended Plan Of Liquidation, and the Notice Of Order (.10); review proposed Notice to publish and E-Mail to Tania Moyron on contents (.10);
08/17/20	R. Richards	0.50	361.50	B320	Review comments and email re Liquidating Trust Agreement and reply to same (0.2); revise and circulate Liquidating Trust Agreement (0.3).
08/17/20	S. Maizel	0.50	400.00	B320	Telephone conference with M. Shinderman, etc. re Integrity claims.
08/17/20	S. Maizel	0.60	480.00	B320	Telephone conference with T. Moyron re plan issues.
08/17/20	N. Koffroth	0.60	300.90	B320	Draft plan supplement
08/17/20	M. Zeefe	0.50	240.13	B320	Emails re plan settlement revisions.
08/18/20	T. Moyron	0.50	299.63	B320	Analyze, finalize settlement agreement (.2); prepare email to secured lenders (.1); analyze email from C. Whitmore re same (.1); analyze email from J. Behrens re Plan Supplement (.1).
08/18/20	T. Moyron	0.20	119.85	B320	Analyze proposed publications of notice of confirmation and related KCC emails.
08/18/20	T. Moyron	1.20	719.10	B320	Conference call with H. Grobstein and team re SGM and Plan (.9); analyze Plan re PCO (.1); exchange emails with H. Grobstein re Plan (.1); exchange emails with M. Kym re PCO and tail (.1).
08/18/20	S. Maizel	0.10	80.00	B320	Review and respond to emails re PCO meeting with liquidating trustee.
08/18/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan issues (x2).
08/18/20	J.A. Moe, II	0.10	59.93	B320	Preliminarily review the Debtors' Reply to SGM's Objection to the Confirmation Order.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/20	J.A. Moe, II	0.70	419.48	B320	In regard to publication of the Notice Of Confirmation, E-Mail to Tania Moyron and Nick Koffroth on approval of revisions to the Notice to be published, review Ms. Moyron's E-Mail and telephone call with Mr. Koffroth on Notice (.20); telephone call to Andres Estrada on revising the Notice (.10); review the revised Notice and E-Mail to Ms. Moyron and Mr. Koffroth (.20); review Tania Moyron's E-Mail and telephone call with Mr. Koffroth on approval to proceed (.10); telephone call returned to Andres Estrada on publishing (.10).
08/18/20	M. Zeefe	1.20	576.30	B320	Revise plan settlement agreement and circulate to parties for final sign-off (1.1); calls with T. Moyron re same (0.1).
08/19/20	M. Zeefe	0.60	288.15	B320	Revise and circulate execution version of plan settlement agreement to settlement parties (0.5); calls with T. Moyron re same (0.1).
08/19/20	D. Pina	0.40	127.50	B320	Docket analysis and assist R. Richards with copies of confirmation related documents.
08/19/20	N. Koffroth	4.20	2,106.30	B320	Draft analysis of administrative claim settlements (2.8); draft memorandum analyzing effective date requirements (1.4)
08/19/20	T. Moyron	1.30	779.03	B320	Call with D. Galfus re status and case matters (.1), call with P. Chadwick re same (.1), (.1), (.2); call with K. Wright re effective date and other background (.2); call with H. Grobstein, et al. (.3); call with H. Kevane re United, Post-Effective Date Debtors, etc. (.3).
08/19/20	S. Maizel	0.60	480.00	B320	Telephone conference with Liquidating Trustee and PCO re insurance issues.
08/19/20	C. Montgomery	1.30	1,040.00	B320	Communications with T Moyron and M Zeefe re plan settlement modifications (.1) ; Phone call with T Moyron regarding post effective date debtor operations (.1) phone call and communications with T Moyron re same (1.1)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	T. Moyron	2.00	1,198.50	B320	Conference call with H. Grobstein, K. Wright, BRG, etc. re waterfall analysis (.8); call with H. Grobstein, K. Wright, Lockton, BRG, etc. re insurance (.7); conference call with H. Grobstein, K. Wright, BRG, et al. re cash management (.5).
08/20/20	T. Moyron	0.80	479.40	B320	Analyze updated liquidating trustee agreement (.2); prepare comment regarding same and correspond regarding same (.2); conference call with D. Bleck re plan matters and Cain (.3); prepare email to R. Adcock, et al. LT agreement (.1).
08/20/20	T. Moyron	0.20	119.85	B320	Analyze effective date obligations under plan and related excel.
08/20/20	T. Moyron	1.40	838.95	B320	Analyze upcoming effective date requirements and plan (.4); analyze settled claims and allowed claims (.3); analyze hurdle analysis (.3); analyze insurance policies re effective date (.2); analyze related correspondence (.2).
08/20/20	R. Richards	0.30	216.90	B320	Revise and circulate Liquidating Trust Agreement.
08/20/20	S. Maizel	1.40	1,120.00	B320	Telephone conference with PCO, Liquidating Trustee's counsel, etc. re insurance issues (.3); telephone conference with M. Shinderman, etc. re Toyon issues (.6); telephone conference with Mintz Levin, etc. re plan issues (.5).
08/20/20	J.A. Moe, II	0.10	59.93	B320	Review Tania Moyron's proposed List of Actions and tasks to be performed post petition, and review comments to the Memorandum.
08/20/20	J.A. Moe, II	0.20	119.85	B320	Telephone call from Elina Tilman on Liquidating Trustee, then review Docket, review Supplement and transmit Supplement to Ms. Tilman.
08/20/20	C. Montgomery	1.10	880.00	B320	Communications with T Moyron re post effective date debtor operations (.6) ; participate in conferences call regarding cash management ( .5)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	M. Zeefe	4.30	2,065.08	B320	Review plan re effective date obligations (2.3); review confirmation order re effective date obligations (1.0); calls with N. Koffroth re same (0.5); follow up re plan settlement agreement execution (0.2); review docket for other potential claims-related motions (0.3).
08/21/20	M. Zeefe	2.60	1,248.65	B320	Circulate signature pages to plan settlement parties with renewed request for execution (0.3); revise plan obligations chart (1.1); review confirmation hearing transcript for errors (1.2).
08/21/20	S. Maizel	0.20	160.00	B320	Telephone conference with T. Moyron re plan effective date issues.
08/21/20	T. Moyron	0.60	359.55	B320	Conference call with KCC, H. Grobstein, et al. services and accounts(.3); conference call with H. Grobstein, et. al. re GRM documents, etc. (.3).
08/21/20	R. Richards	0.20	144.60	B320	Revise and circulate liquidating trust agreement.
08/21/20	K.M. Howard	0.30	75.23	B320	Email exchanges with K. Persuad of Hyatt Court Reports and followup telephone conference (.2); email exchanges with T. Moyron regarding the submission of corrections to the transcript of the confirmation hearing and reviewed ongoing email exchanges updating the status of review (.1).
08/22/20	A. Ruegger	0.50	400.00	B320	Begin draft of Common Interest Agreement with Liquidating Trustee.
08/23/20	A. Ruegger	3.00	2,400.00	B320	Continue drafting Common Interest Agreement with Liquidating Trustee (2.5); communications with T. Moyron and Dentons team re: same (.5).
08/24/20	T. Moyron	0.70	419.48	B320	Analyze transcript, comments and provide comments.
08/24/20	C. Richter	0.80	516.80	B320	Re Plan and Disclosure Statement codes. Call with C. Montgomery regarding release of liens in Verity's bank accounts (.3); review files regarding same (.5).
08/24/20	S. Maizel	1.00	800.00	B320	Telephone conference with T. Moyron, etc. re post-effective date leadership issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	N. Koffroth	2.20	1,103.30	B320	Draft comments to hearing transcript re confirmation hearing
08/24/20	C. Montgomery	1.10	880.00	B320	Phone conference with C. Richter regarding effective date releases (.4) ; communications with T. Moyron re same (.2) ; communications with P. Chadwick regarding bank account transfers to LT and signatures (.5)
08/24/20	J.A. Moe, II	0.20	119.85	B320	In response to Tania Moyron's request: Review Judge Robles' Docket and Tentative Ruling, for decision on SGM's pending Motion
08/24/20	M. Zeefe	4.30	2,065.08	B320	Follow up re plan settlement agreement (0.1); review confirmation hearing transcript for errors (4.0); emails and calls with N. Koffroth re same (0.2).
08/25/20	M. Zeefe	0.10	48.03	B320	Follow up re plan settlement agreement execution.
08/25/20	N. Koffroth	1.30	651.95	B320	Draft response to proposed amended confirmation findings
08/25/20	J.A. Moe, II	0.40	239.70	B320	Exchange E-Mails with Matthew Garms on By Laws for each of the Verity Entities, then E-Mail to and telephone call from Kathryn Howard, telephone call to office personnel and telephone call returned from Milton Set on access to By Laws (.30); conference telephone call with Kathryn Howard and Matthew Garms on By Laws (.10).
08/25/20	S. Maizel	0.20	160.00	B320	Review court's ruling on SGM objection to confirmation order.
08/25/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron re discussions with Trustee and R. Adcock.
08/25/20	S. Maizel	0.10	80.00	B320	Telephone conference with Brian Song re notice of confirmation.
08/25/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, etc. re responsible officer, etc.
08/25/20	S. Maizel	0.10	80.00	B320	Telephone conference with T. Moyron re post-effective date issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	K.M. Howard	0.40	100.30	B320	Analysis of Order on SGM's Objection to the Form of Order Confirming the Modified Second Amended Plan and reviewed and revised Critical Date Memorandum.
08/25/20	T. Moyron	0.70	419.48	B320	Conference calls with S. Maizel re plan matters (.3); conference call with S. Maizel and N. Koffroth re plan implementation and case management (.4).
08/25/20	T. Moyron	0.90	539.33	B320	Conference call with Mintz, BRG, Houlihan re recovery analysis.
08/26/20	K.M. Howard	0.20	50.15	B320	Email exchange with T. Moyron regarding response to motion for stay, assembled same and prepared email to T. Moyron.
08/26/20	T. Moyron	0.50	299.63	B320	Verity internal call with R. Adcock, H. Levy-Biehl, BRG, et al. re post sale matters, plan, etc.
08/26/20	M. Zeefe	0.10	48.03	B320	Follow up re plan settlement agreement execution.
08/26/20	N. Koffroth	4.80	2,407.20	B320	Draft opposition to SGM motion to stay effectiveness of confirmation order
08/26/20	S. Maizel	1.00	800.00	B320	Telephone conference with R. Adcock, BRG, etc. re pending issues.
08/26/20	C. Montgomery	1.80	1,440.00	B320	Phone call with T Moyron re effective date payments issue (.2); phone call with N Koffroth re post effective date lien releases (.1) ; communications with T Moyron re adequate protection versus Initial Payment to 2005's (.2) ; review courts order on modification of proposed order and draft request to Mintz re Effective Date payments (1.1) ; phone call with T Moyron re same (.2)
08/27/20	T. Moyron	0.50	299.63	B320	Analyze response and prepare comments re Order re SGM.
08/27/20	M. Zeefe	1.20	576.30	B320	Revise chart of effective date obligations under plan and confirmation order.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	C. Montgomery	1.90	1,520.00	B320	Phone call with D Galfus re effective date issues and Committee counsel posture (.5); communications with T Moyron and T Conner regarding Effective Date payments (.1); communications with M Welch and C Richter regarding effective date bond and Mechanics lien releases (1.3).
08/27/20	N. Koffroth	4.70	2,357.05	B320	Draft response to Court's proposed findings re confirmation
08/28/20	N. Koffroth	2.20	1,103.30	B320	Draft response to Court's proposed amended confirmation findings
08/28/20	M. Zeefe	0.50	240.13	B320	Revise chart of effective date obligations under plan and confirmation order.
08/28/20	C. Montgomery	0.90	720.00	B320	Communications with N Koffroth regarding supplemental response to Court on Confirmation order (.1); participate in phone conference with D Bleck, M Shinderman, T Moyron re emergency stay (.8)
08/28/20	C. Montgomery	1.30	1,040.00	B320	Communications with C Richter regarding effective date lien release issues (.7) ; communications with counsel for 2005s, 2015s, 2017 bonds and MOB Financing re same (.6)
08/28/20	S. Maizel	0.20	160.00	B320	Review and respond to draft limited response to Court's preliminary findings re confirmation.
08/28/20	C. Richter	0.80	516.80	B320	Review records regarding executed deposit account control agreements and government receivables control agreements.
08/28/20	C. Richter	2.00	1,292.00	B320	Prepare agreements.
08/28/20	C. Richter	0.40	258.40	B320	Email exchange with C. Montgomery.
08/28/20	C. Richter	0.30	193.80	B320	Call from J. Emerson at BRG regarding lien releases.
08/29/20	C. Montgomery	0.40	320.00	B320	Phone call with D Galfus regarding effective date issues.
08/30/20	C. Montgomery	0.20	160.00	B320	Phone call with T Moyron regarding 2005 Effective Date issues.
08/30/20	S. Maizel	0.20	160.00	B320	Review and revise opposition to emergency motion to stay confirmation order.

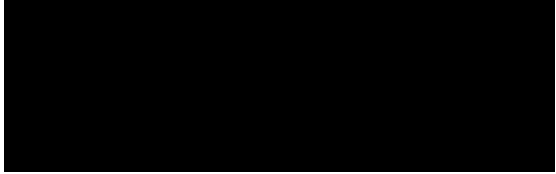
Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	N. Koffroth	0.40	200.60	B320	Emails to counsel to secured creditors (0.2) and committee (0.1) re liquidating trust agreement; email to Committee counsel re plan settlement (0.1)
08/31/20	C. Richter	0.30	193.80	B320	Email from C. Montgomery regarding same.
08/31/20	C. Richter	0.30	193.80	B320	Email and call with M. Garms regarding action items for the week to meet the conditions to closing.
08/31/20	C. Montgomery	3.70	2,960.00	B320	Communications with M Welch, G Medina and C Richter regarding lien releases (.1); communications with counsel for secured creditors regard accrued fees for Plan Effective Date (.6); communications With C Richter re lender follow up (.2); review plan date distribution analysis and Communications with T Moyron re same (.8); phone calls with J Schlant and T Moyron re same (.3); communications with T Moyron regarding Liquidating Trust Account questions (.5); phone conference with T Moyron re same (.5) ; communications with D Bleck and T Moyron re HL success fee (.1); communications with M Welch and J Emerson re mechanics lien releases (.2); communications with R Westhoff re title searches (.2); communications with C Richter re deeds of trust for MOB Financing (.2)
08/31/20	C. Richter	0.40	258.40	B320	Finalize Notices of Termination of GRAAs.
08/31/20	C. Richter	0.40	258.40	B320	Email to Maslon firm to distribute Notices of Termination.
08/31/20	C. Richter	0.30	193.80	B320	Call with M. Preusker regarding releases needed to meet conditions to restructuring plan.
08/31/20	C. Richter	0.30	193.80	B320	Email to M. Preusker and N. Coco regarding same.
08/31/20	M. Zeefe	0.10	48.03	B320	Follow up re plan settlement agreement execution.
08/31/20	S. Maizel	0.20	160.00	B320	Telephone conference with Tania Moyron re plan effective date issues.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	T. Moyron	1.20	719.10	B320	
08/31/20	T. Moyron	4.10	2,456.93	B320	Conference call with BRG, J. Moe, et al. re claims (.4); conference call with J. Schlant re flow of funds on the effective date (.5); analyze emails from J. Schlant and attached flow of funds (.3); conference call with P. Chadwick re operating budget and plan (.2), (.1); analyze reserves and plan in connection therewith (.4); call with D. Bleck and P. Chadwick re operating budget and plan (.2); analyze P. Chadwick email re operating budget (.1); analyze operating budget and conference call with H. Grobstein, BRG, et al. re waterfall analysis (.9); prepare email to H. Grobstein re effective date reserves (.2); conference calls with C. Montgomery re accounts and other matters (.3), (.5).
08/31/20	T. Moyron	0.60	359.55	B320	Coordinate final LT agreement (.2); analyze conditions precedent to plan (.2); correspond regarding list of contracts re rejection/assumption re plan (.2).
08/31/20	R. Westhoff	0.60	280.80	B320	Review issues re: deed of trust reconveyances and UCC terminations needed for effective date of plan reorganization (.3); gather and review title reports re: same (.3).
09/01/20	C. Montgomery	4.50	3,600.00	B320	Phone call with C Richter regarding Effective Date lien release requirements (.2); phone call with J Emerson regarding mechanics lien releases (.1); review information on deeds of trust and phone and communications with C Richter re same (1.6); communications with A Korda and M Preuska, D Bleck, B Klein regarding interest computations (.2) ; review Effective Date payments draft (.3); phone call with C Richter regarding UMB Bank line releases (.3); prepare for and participate in conference call with D Bleck, P Ricotta T Moyron regarding lien releases and Houlihan adequate protection payment (.7);

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					follow up call with T Moyron re same (.3); communications with D Galfus regarding Milbank effective date money (.1); participate in conference call with R Adcock P Chadwick S Maizel, re Houlihan, Cain and Insurance reserves effective date payments ( .7)
09/01/20	C. Richter	1.00	646.00	B320	Finalize six Notices of Termination of GRAAs.
09/01/20	M. Zeefe	0.80	384.20	B320	Review opposition to SGM's motion to stay confirmation order.
09/01/20	T. Moyron	0.40	239.70	B320	Analyze matters related to lease and contracts re plan (.3); prepare email to J. Emerson re call (.1).
09/01/20	T. Moyron	2.80	1,677.90	B320	Analyze and prepare comments to opposition to SGM's limited motion for stay.
09/01/20	R. Richards	0.30	216.90	B320	Review Verity plan re treatment of self-insured retention and reply to Tania Moyron email re same.
09/01/20	T. Moyron	4.10	2,456.93	B320	Conference call with J. Schlant re flow of funds and hurdle (1.5); conference call with P. Chadwick and J. Schlant re flow of funds and hurdle (.7); analyzed updated flow of funds and hurdle (.3); exchange emails with J. Schlant re same (.2); calls with R. Adcock re same (.2); (.3); follow up call with R. Adcock, BRG, et al. re same (.2); prepare email to Minz re flow of funds (.1); analyze email from H. Grobstein re flow of funds (.1) and prepare email re same (.1); analyze plan provisions in connection with reserves and claims (.4).
09/01/20	R. Westhoff	2.10	982.80	B320	Review and revise draft email to L. Kmiec re: request for title work for deed of trust reconveyances and UCC terminations needed for plan reorganization (.2); review closing binders re: final title commitments (.3); prepare for and participate in conference call with B. Klein, J. Reed, E. Snyder and C. Richter re: strategy for deed of trust reconveyances and UCC terminations (.6); review email from E. Snyder re: same (.1); coordinate identification of and listing of all recorded deeds of trust to be reconveyed (.2); review

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					emails from L. Kmiec re: form substitution of trustee and reconveyance and UCC termination (.1); review same (.1); review emails from B. Klein re: same (.2); review initial draft of reconveyance (.3).
09/01/20	C. Richter	0.20	129.20	B320	Email to M. Welch regarding UCC terminations.
09/01/20	C. Richter	2.00	1,292.00	B320	Draft terminations of deposit account control agreements over the gross revenue accounts at Bank of America.
09/01/20	S. Maizel	0.30	240.00	B320	Telephone conference with T. Moyron, etc. re insurance claims vis-à-vis plan payments.
09/02/20	T. Moyron	4.20	2,516.85	B320	Analyze matters related to flow of funds and effective date and plan (2.2); call with H. Grobstein, BRG, et al. re 15.3 reserve (1.1); call with Mintz, HL, BRG, et al. (.9).
09/02/20	T. Moyron	2.90	1,737.83	B320	Analyze and prepare comments to opposition to SGM's request for limited stay (2.3); correspond with P. Pascuzzi re Toyon (.2); analyze P. Chadwick, et al., emails re same (.2); analyze H. Kevane, et al., emails re SCAN (.2).
09/02/20	R. Westhoff	1.90	889.20	B320	Review issues re: reconveyances and terminations of GRAAs and DACAs (.2); review drafts of same (.3); review email from T. Connor re: revisions to same (.1); review email from B. Klein re: comments to same (.2); review emails from L. Kmiec re: revisions to draft reconveyances and UCC terminations (.2); telephone calls from/to L. Kmiec re: mechanic's lien releases and logistics for lien payments (.4); review strategy for same (.2); review email from J. Schlant re: list of lien claimants and funds to be released (.3).
09/02/20	C. Richter	0.20	129.20	B320	Forward to U.S. Bank teams.
09/02/20	C. Richter	0.30	193.80	B320	Email from C. Montgomery regarding additional deeds of trust to be cancelled by Verity MOB Financing, as regards part II of their financing to Verity
09/02/20	C. Richter	0.40	258.40	B320	Email further deeds of trust to Verity MOB Financing team.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/20	C. Richter	1.50	969.00	B320	Finalize 6 terminations of deposit account control agreements over the gross revenue accounts at Bank of America and add updated notice and names to same.
09/02/20	C. Richter	0.40	258.40	B320	Call with B. Klein, counsel to U.S. Bank regarding signatories and process for completing the DACAs and GRAAs.
09/02/20	C. Richter	0.30	193.80	B320	Email from and to I. Hammel.
09/02/20	C. Richter	0.20	129.20	B320	Email from U.S. Bank counsel B. Klein regarding adding language to the DACA and GRAA terminations.
09/02/20	C. Richter	0.80	516.80	B320	Updated DACAs and GRAAs re same.
09/02/20	C. Richter	0.30	193.80	B320	Call with C. Montgomery regarding suggested language by U.S. Bank regarding termination notices.
09/02/20	C. Richter	0.20	129.20	B320	Call with B. Klein re same.
09/02/20	C. Richter	0.30	193.80	B320	Email to B. Klein and other U.S. Bank counsel regarding same.
09/02/20	C. Montgomery	3.40	2,720.00	B320	Phone call with C Richter regarding deed of trust issue for MOB and US bank Liens (.5) ; communications with C Richter re MOB Financing II (.7) ; communications with R Amkraut regarding Swinerton release (.1) ; communications with C Richter and US Bank counsel re DACA releases and payoff information (.2); participate in phone conference re flow of funds for effective date closing (1.1);communications with C Richter regarding proposed email to B Klein re lien release (.3) ; phone calls J Emerson re effective date closing (.2); phone call with P Chadwick re sane (.1) ; phone call with T Conner re DACA issue(.1); communications with E Paul and J Emerson re Premier notice(.1)
09/02/20	C. Richter	0.40	258.40	B320	Email T. Connor at Verity regarding six Notices of Termination of DACAs to confirm account names and numbers.
09/02/20	C. Richter	0.30	193.80	B320	Call with A. Kordas regarding Verity MOB Financing deliverables for the closing of the reorganization plan.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/20	C. Richter	0.80	516.80	B320	Email to Verity MOB Financing counsel regarding forms of deed and fixture cancellations and instructions.
09/02/20	S. Maizel	0.70	560.00	B320	Telephone conference with Mintz Levin, etc. re post-effective date expenses and budget.
09/02/20	K.M. Howard	0.30	75.23	B320	Analysis of Debtors' Limited Response to Order on SGM's Objection to the form of the Order Confirming the Modified Second Amended Plan to determine additional requirements requested by Debtors.
09/02/20	T. Moyron	1.80	1,078.65	B320	Correspond with M. Shinderman re administrative claims (.2); analyze status of DACA termination, MOB financing, and related emails (.3); correspond with M. Shinderman re SGM proposal (.1); analyze revised forecast of the LT Budget and Operating Budget (.3) and correspond with J. Schlant et al re same (.2); analyze matters related to BM (.2); analyze email from D. Galfus related to BM (.1); exchange emails with H. Grobstein re cash flow call (.1); analyze Chicago Title, et al. correspondence re Swinerton Builders (.1); analyze M. Preusker email re pay off calculation (.1); analyze email from Mintz re lien releases (.1).
09/02/20	M. Zeefe	0.50	240.13	B320	Review draft opposition to SGM motion to stay confirmation order (0.2); calls with N. Koffroth re same (0.3).
09/03/20	M. Zeefe	0.10	48.03	B320	Emails re plan supplement.
09/03/20	R. Westhoff	4.20	1,965.60	B320	Review email from B. Klein re: form of termination of DACAs and GRAAs (.1); review email from B. Klein re: draft reconveyance documents for Deeds of Trust and related Subordination Agreements (.1); coordinate review of same (.2); review issues re: same (.3); review email from B. Klein re: draft UCC terminations (.1); coordinate review of same (.2); review email from R. Amkraut re: frustration with payoff procedure (.1); review issues and strategy for same (.3); telephone calls and emails to/from L. Kmiec and B. Lewis re: setting up escrow (.4);

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					review Release of Mechanics' Lien from Ham's Electric (.2); coordinate review of draft UCC financing statement terminations (.2); review draft escrow transmittal letter from B. Klein (.1); review draft Sole Order Escrow Trust Instructions from B. Lewis (.3); review issues re: California Industrial mechanic's lien (.1); review emails from B. Johnson and B. Lewis re: invoice for escrow and recording fees (.1); review and analyze issues re: potential double payment to lien claimants and subcontractors (.4); coordinate review and resolution of same (.3); review proposed revisions to reconveyance documents (.3); review emails from B. Klein re: coordinating execution of release and termination documents (.1); review proposed revisions to mechanic's lien schedule (.3).
09/03/20	K.M. Howard	0.30	75.23	B320	Analysis of the Memorandum of Decision and Order regarding Debtors' Modified Second Amended Plan (.2); prepared email to Verity Team regarding same (.1).
09/03/20	J.A. Moe, II	0.40	239.70	B320	Telephone call from An Ruda on prepetition obligations and postpetition procedures, including authority of payment incurred prepetition and post petition litigation procedures.
09/03/20	J.A. Moe, II	0.60	359.55	B320	Review the Debtors' Opposition to SGM's Motion For Stay of the Effective Date in regard to confirmation of the Plan Of Liquidation, and the Declarations of Richard Adcock and Peter Chadwick (.40); review Judge Robles' Memorandum Of Decision and Order on SGM's Objection to the proposed Order on confirmation of the Plan of Liquidation (.20).
09/03/20	S. Maizel	0.60	480.00	B320	Telephone conference with BRG, etc. re funds flow on effective date, etc.
09/03/20	K. Murphy	1.30	541.45	B320	Multiple telephone calls with John Moe re preparation of updated EPL chart with SIR calculation (.3); and prepare edits to update the chart (1.0).
09/03/20	S. Maizel	0.60	480.00	B320	Telephone conference with BRG re distribution of funds on effective date.



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	J. Kim	0.30	79.05	B320	Identify multiple DACA termination documents and forward to Carolyn Richter for client's execution
09/03/20	J. Kim	0.20	52.70	B320	Identify multiple DACA termination documents and forward to Carolyn Richter for client's execution.
09/03/20	S. Alberts	0.50	400.00	B320	VHS Plan. Review confirmation order and related materials and follow up.
09/03/20	T. Moyron	1.00	599.25	B320	Correspond with Committee counsel, et al. re flow of funds and call (.2); analyze BRG emails re flow of funds (.2); call with Committee and 2005 advisors, BRG, C. Montgomery, etc. (.6).
09/03/20	T. Moyron	2.10	1,258.43	B320	Analyze updated flow of funds and support schedules (.3); conference call with R. Adcock re flow of funds (.2); conference call with P. Chadwick re flow of funds and operational budget (.3); conference call with BRG, R. Adcock, C. Montgomery, et al. re flow of funds (.5); call with D. Bleck re flow of funds (.2); call with 2005 advisors re same (.6).
09/03/20	T. Moyron	0.70	419.48	B320	Analyze omnibus rejection motions (.2); analyze correspondence from H. Kevane, et al. re same (.3); analyze related matters (.2).
09/03/20	T. Moyron	0.50	299.63	B320	Conference call with H. Levy-Biehl re effective date, case matters, etc. (.3); call with D. Galfus re flow of funds, effective date (.2).
09/03/20	C. Richter	1.60	1,033.60	B320	Draft six terminations of government receivables account agreements.
09/03/20	C. Richter	0.40	258.40	B320	Email to UMB Bank's counsel re letter head and signatures needed.
09/03/20	C. Richter	0.60	387.60	B320	Email to U.S. Bank's counsel re GRAA terminations.
09/03/20	C. Richter	0.40	258.40	B320	Email to UMB Bank's counsel regarding DACA terminations.
09/03/20	C. Richter	1.00	646.00	B320	Review drafts of cancellations from U.S. Bank's counsel.
09/03/20	C. Richter	0.50	323.00	B320	Discuss same with Nicholas Carson.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	C. Richter	4.00	2,584.00	B320	Work with secretary to put letterhead on and compile 16 termination notices
09/03/20	C. Richter	0.40	258.40	B320	Call with C. Montgomery regarding need for terminations from the bond trustees by tomorrow.
09/03/20	C. Montgomery	0.20	160.00	B320	Communications with T Moyron and M Garms re board effective date resolutions (.1) ; communications with M Shinderman and T Moyron re case ending issues (.1)
09/03/20	C. Montgomery	0.50	400.00	B320	Phone calls with C Richter regarding closing DACA terminations and US Bank deeds of trust releases (.1) ; phone call with T Moyron regarding closing issues (.4)
09/04/20	C. Richter	0.50	323.00	B320	Attention to closing and funding the reorganization plan, including review of UMB appointment instrument to attach to UMB Bank's terminations of deposit account control agreements (DACAs) addressed to Bank of America
09/04/20	C. Richter	0.30	193.80	B320	Confirm no GRAA terminations are needed from UBM Bank because as master trustee they did not sign the post-petition government receivables account agreement (GRAA).
09/04/20	C. Richter	0.50	323.00	B320	Call with legal assistant to assemble the executed U.S. Bank terminations of DACAs and GRAAs.
09/04/20	C. Richter	0.50	323.00	B320	Call with J. Kim, paralegal, to explain the DACAs from UMB Bank and to advise on assembly of same with notice of appointment of UMB Bank added
09/04/20	C. Richter	0.40	258.40	B320	Emails with U.S. Bank's counsel re finalizing and recording cancellations of deeds of trust and fixture filings.
09/04/20	C. Richter	0.30	193.80	B320	Call with I. Hammel at UMB Bank regarding cooperation post-effective date to sign and authorize real estate filings on behalf of UMB Bank.
09/04/20	C. Richter	1.00	646.00	B320	Review and distribute all U.S. Bank's terminations notices to B. Klein for review.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	C. Richter	0.20	129.20	B320	Call with A. Kordas regarding filing UCC-1 terminations on behalf of Verity MOB Financing.
09/04/20	C. Richter	0.70	452.20	B320	Review and distribute all UMB Bank termination notices to I. Hammel to review
09/04/20	C. Richter	0.20	129.20	B320	Follow up email to B. Klein at U.S. Bank regarding filing UCC-1 terminations on behalf of U.S. Bank.
09/04/20	C. Richter	0.20	129.20	B320	Confirmation email from I. Hammel of receipt of funds.
09/04/20	C. Richter	1.00	646.00	B320	Attention to faxing UMB Bank's termination of DACA notices to Bank of America and reviewing confirmations of each fax.
09/04/20	C. Richter	0.90	581.40	B320	Further emails with B. Klein as counsel to U.S. Bank regarding confirmation of receipt of various wires by U.S. Bank and its professionals.
09/04/20	C. Richter	0.60	387.60	B320	Calls with Dentons office services team to coordinate standby of personnel to wire.
09/04/20	C. Richter	0.20	129.20	B320	Call with C. Montgomery regarding same.
09/04/20	C. Richter	0.20	129.20	B320	Call with M. Preusker regarding same.
09/04/20	C. Richter	0.20	129.20	B320	Call with J. Schlant at BRG to provide confirmation that Grant Thornton has received its wire.
09/04/20	C. Richter	0.20	129.20	B320	Email from J. Schlant with spreadsheet to confirm issuance of wire to Grant Thornton
09/04/20	C. Richter	0.20	129.20	B320	Email to B. Klein to advise wires were transmitted to Grant Thornton, as well as U.S. Bank and its professionals.
09/04/20	N. Koffroth	0.70	351.05	B320	Draft notice of effective date
09/04/20	C. Montgomery	1.60	1,280.00	B320	Review updated effect date cash report (.4); phone calls with C Richter regarding DACA and lien release issues (.4) ; phone calls with J Emerson and J Schlant re same (.2) ; phone call with M Welch re same (.1); phone call T Conner re closing (.1) ; phone calls with T Moyron re effective sate closing issues (.4)

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	C. Montgomery	0.80	640.00	B320	Communications with R Westhoff C Richter and A Kordas regarding MOB DOT documentation (.2); communications with T Moyron regarding wire timing and lien release documentation (.1) ; communications with I Hammel re closing (.1); communications with B Klein re effective date closing and lien releases timing (.4)
09/04/20	J.A. Moe, II	0.10	59.93	B320	Review John Schlant's "Effective Date Flow Of Funds" Analysis .
09/04/20	K. Murphy	1.00	416.50	B320	Prepare edits to Verity Litigation Management Chart to reflect recent changes made on smaller version of ELP chart (.8); and prepare further revisions to 9-3-20 EPL small chart to revise prior SIR calculations (.1); and telephone call to John Moe re revisions to total SIR amount provided on 9-2-20 (.1).
09/04/20	T. Moyron	1.60	958.80	B320	Attend to matters related to effective date and related correspondence and documents.
09/04/20	R. Westhoff	2.20	1,029.60	B320	Follow up on issues with mechanic's lien schedule and revisions to same (.3); review additional draft reconveyance and UCC termination documents (.2); review issues re: Royal West mechanic's liens (.1); review executed termination notice for GRAAs and DACAs (.1); review issues re: payoff of California Industrial mechanic's lien (.1); review strategy for filing state UCC terminations (.2); review revised Sole Order Escrow Trust Instructions (.3); review email from B. Lewis re: same (.1); coordinate additional revisions to same (.1); review logistics for transmitting original releases to title company (.1); review status of funds flow for payoffs (.1); review emails from B. Lewis re: confirmation of receipt of wires (.1); review email from B. Klein re: transmittal of executed release documents to title company (.1); review emails from B. Klein re: receipt of payoff wires (.1); review issues re: outstanding mechanic's lien releases (.2).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	S. Maizel	1.00	800.00	B320	Review and respond to emails re plan distributions, etc.
09/04/20	S. Maizel	0.40	320.00	B320	Review and respond to reply re stay pending appeal filed by SGM.
09/04/20	N. Koffroth	4.70	2,357.05	B320	Draft plan supplement and related attachments
09/04/20	J. Kim	3.50	922.25	B320	Assemble closing documents.
09/04/20	K.M. Howard	0.40	100.30	B320	Analysis of Notice of Occurrence of Effective Date of Modified Second Amended Joint Plan and reviewed and revised Critical Dates Memorandum.
09/04/20	K.M. Howard	0.40	100.30	B320	Analysis of Notice of Certain Plan Supplemental Documents Regarding the Modified Second Amended Joint Plan to determine additional deadlines and requirements.
09/04/20	T. Moyron	4.10	2,456.93	B320	Analyze emails from J. Schlant, et al. re flow of funds (.4); analyze emails from lenders re payoff, DACA, etc. (1.3); conference calls regarding amounts, plan, etc (2.4).
09/04/20	T. Moyron	2.30	1,378.28	B320	Conference calls with R. Adcock, BRG. et al re flow of funds, case matters, Marillac, etc.
09/04/20	R. Richards	0.40	289.20	B320	Call from Emerson re contract rejection list (0.1); review draft of rejection list (0.3).
09/04/20	M. Zeefe	0.40	192.10	B320	Finalize plan settlement agreement (0.3); call with N. Koffroth re plan supplement and other effective date tasks (0.1).
<b>Subtotal</b>		<b>682.50</b>	<b>405,301.81</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

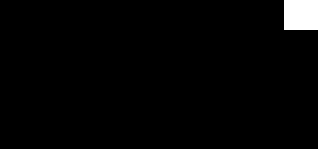
September 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	S. McCandless	0.90	719.10	EMP	Labor and bankruptcy team conference call (.30); review communication from P. Chadwick regarding handling of employee transferring from St. Francis to VHS (.10); review prior related client communications to respond to same (.20); telephone call with A. Youssefi to discuss same (.20); respond to P. Chadwick regarding same (.10).
08/04/20	N. Koffroth	0.10	50.15	EMP	Participate in weekly internal labor call
08/04/20	S. Alberts	0.20	160.00	EMP	Labor call.
08/04/20	A. Shiran	1.30	668.85	EMP	Labor call (.2); review issues relating to transfer of employees for temporary employment in connection with hospital sales (.4) discuss same with S. McCandless (.2); correspondence with P. Chadwick regarding same (.2); review WARN Notices to confirm WARN period for employees to be transferred/have employment continued (.3).
08/05/20	A. Shiran	1.20	617.40	EMP	Evaluate sale status and next steps relating to SMC and SFMC (.2); correspondence with S. McCandless regarding same (.1); organize all WARN Notices issued in connection with hospital sales and closures in connection with next steps towards close of the hospitals (.9).
08/05/20	S. McCandless	0.30	239.70	EMP	Communications to A. Youssefi regarding status of anticipated closures in context of notifications to employees (.20); communicate with A. Youssefi and T. Moyron regarding same (.10).
08/06/20	S. McCandless	0.20	159.80	EMP	Communicate with T. Moyron and A. Youssefi regarding status of pending sales of St. Francis and Seton in context of employment separations.
08/06/20	A. Shiran	0.50	257.25	EMP	Discuss status of hospital sales with T. Moyron (.1); evaluate and analyze next steps pre closing including employee actions (. 4).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	M. Zeefe	2.70	1,296.68	EMP	Revise and finalize order granting 1113 motion (1.8); call with N. Koffroth re same (0.1); emails re same (0.1); emails re GRM arrangement (0.2); email re RPHE and Local 39 trust agreements rejection (0.5).
08/07/20	M. Zeefe	0.10	48.03	EMP	Emails with C. Doherty re 1113 CBA rejection.
08/10/20	A. Shiran	3.30	1,697.85	EMP	Analyze employee matters relating to closure of hospitals including particular closing date and implications of same (1.6); discuss same with S. McCandless (1.5); correspondence regarding same with client and bankruptcy team (.2);
08/10/20	K.M. Howard	0.40	100.30	EMP	Reviewed email from T. Moyron regarding 1113 settlement agreement (.1); reviewed agreement, created file folders for same and imported the document (.2); prepared email to T. Moyron (.1).
08/10/20	S. McCandless	2.50	1,997.50	EMP	Communicate with T. Moyron and clients regarding handling of separations in context of current information as related to closure of hospitals (.20); 
08/11/20	S. McCandless	1.00	799.00	EMP	Telephone call with A. Youssefi regarding updated notices for corporate employees (.30); review related prior correspondence for same (.60); communicate with S. Maizel regarding same (.10).
08/11/20	A. Shiran	0.80	411.60	EMP	Draft WARN Update to VHS and VBS remaining system employees (.6); correspondence regarding same with S. McCandless and bankruptcy team (.2).
08/12/20	S. McCandless	0.80	639.20	EMP	Revision of employee privacy notice to encapsulate any corporate employees hired by Prime (.30); related communications with R. Adcock and H. Levy-Biehl regarding same (.30); review government notices re employee terminations (.20).

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	A. Shiran	0.70	360.15	EMP	Draft government update regarding employee terminations for remaining system VHS employees (.4); draft government update regarding employee terminations for remaining system VBS employees (.3).
08/27/20	S. McCandless	0.90	719.10	EMP	Review communication from P. Chadwick regarding termination dates for employees now on temporary status (.20); review prior related letters to employees (.20); respond to P. Chadwick with related recommendation (.50).
08/28/20	S. McCandless	0.10	79.90	EMP	Communicate with P. Chadwick regarding decision as to termination dates for employees now on temporary status.
<b>Subtotal</b>		<b>18.00</b>	<b>11,021.56</b>		



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	A. Minton	0.80	350.20	INS	Revise Marillac ancillary documents.
08/02/20	G. Miller	2.20	972.40	INS	Revise Marillac sale motion.
08/02/20	R. Millner	0.10	80.00	INS	Telecon G. Miller re Chubb insurance issues and proposal.
08/02/20	J. Fisher	1.30	491.40	INS	Work on Marillac SPA and related matters; correspondence regarding same.
08/03/20	G. Miller	1.40	618.80	INS	Revise declarations in support of Marillac sale motion.
08/03/20	R. Millner	0.30	240.00	INS	Review draft Marillac stock sale motion.
08/03/20	R. Millner	0.50	400.00	INS	Review Marillac stock sale contract.
08/03/20	R. Millner	0.50	400.00	INS	Emails O. Pinkas and R. Richards re Marillac sales related to Old Republic.
08/03/20	O. Pinkas	0.20	160.00	INS	Emails with working ground re: background on prior Marillac sale strategy.
08/03/20	C. Montgomery	0.10	80.00	INS	Communications with T Moyron, O Pinkas, R Milner re Marillac developments.
08/03/20	J. Fisher	1.50	567.00	INS	Review and revise Marillac SPA (.7); review and comment on ancillary documents (.5); correspondence regarding resumption of transaction process (.3).
08/04/20	R. Richards	1.40	1,012.20	INS	Review Prime sale documents re insurance requirements (1.2), discuss same with Matt Garms (0.1), emails with Lockton re bid status (0.1).
08/06/20	R. Richards	0.80	578.40	INS	Call re new personal injury claims (.40); emails re personal injury claims (.20); discuss Marillac sale with D. Galfus of BRG (.20).
08/06/20	R. Millner	0.40	320.00	INS	Telecon L. Well, J. Moe, et al re recent professional liability claims.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	J.A. Moe, II	0.50	299.63	INS	/Marillac - Tender of New Claims/ Participate in multiple person conference telephone call scheduled by Lisa Wall, on insurance related issues pertaining to sale of Marillac and newly asserted claims (.30); review "follow up" E-Mail from Ty Conner and telephone call with Hope Levy-Biehl on conference call (.20).
08/09/20	C. Montgomery	0.10	80.00	INS	Communications with D Galfus and T Moyron regarding Marillac and FTI.
08/09/20	T. Moyron	0.20	119.85	INS	Exchange emails with Committee call re Marillac (.1); conference call with D. Galfus re same (.1).
08/10/20	S. Walker	1.00	800.00	INS	Analyze Randall & Quilter Indicative Bid for MICL and separate draft agreement with ORIC, emails from L. Wall regarding same, Transition Services Agreement for St. Francis deal, and issue chart regarding insurance coverage after sales of hospitals, emails from T. Conner and R. Millner regarding same.
08/10/20	R. Millner	0.40	320.00	INS	Emails to R. Richards re insurance issues as to Marillac and hospital sale.
08/11/20	R. Millner	0.20	160.00	INS	Read and respond to R. Richards and other emails re Marillac insurance coverage issues.
08/11/20	C. Montgomery	0.10	80.00	INS	Communications with S. Martin regarding insurance issues.
08/12/20	S. Walker	0.10	80.00	INS	Analyze Marillac excess policy for 2020/2021 period re extended reporting period.
08/14/20	R. Richards	1.20	867.60	INS	Emails re proposed Marillac sale (0.2); internal conference call re proposed Marillac sale (0.7); review and circulate talking points slide with cover email (0.3).
08/14/20	T. Moyron	0.70	419.48	INS	Conference call with H. Grobstein re Marillac sale timing, SGM and other matter (.3); compile selective documents for H. Grobsten (.2); prepare email regarding same (.2).
08/14/20	T. Moyron	1.70	1,018.73	INS	Analyze matters related to Marillac sale and calls related to same.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	S. Walker	0.70	560.00	INS	Participate in call with B. Richards et al. to discuss Marillac sale offer.
08/14/20	S. Walker	1.30	1,040.00	INS	Analyze ORIC assumption agreement and related background documents.
08/14/20	R. Millner	0.30	240.00	INS	Review Marillac proposal and draft OR assumption agreement.
08/14/20	R. Millner	0.10	80.00	INS	Email R. Richards regarding Marillac side issues.
08/14/20	R. Millner	0.70	560.00	INS	Telephone conference with Lisa Wall, Richard Adock, Ty Connor, Tania Moyron, Susan Walker regarding Marillac sale issues.
08/17/20	R. Millner	0.20	160.00	INS	Emails to Richards and Moyron regarding Old Republic collateral regarding Marrillac.
08/17/20	R. Millner	0.40	320.00	INS	Telephone conference with Lisa Wall (Lockton) regarding Old Republic collateral review.
08/17/20	R. Millner	0.20	160.00	INS	Read email from Lisa Wall regarding collateral status.
08/18/20	T. Moyron	0.50	299.63	INS	Conference call with R. Adcock, BRG, Lockton et al. re Marillac insurance matters.
08/18/20	T. Moyron	0.30	179.78	INS	Analyze L. Wall et al., emails re proposed exclusivity agreement re Marrillac (.2); analyze exclusivity agreement (.1).
08/18/20	C. Montgomery	1.10	880.00	INS	Phone call with D Galfus re buyer exclusivity request (.2); review same (.3); communications with T Moyron and R Richards re same (.1); participate in phone call with R Adcock, L Wall, R Millner, T Moyron, re coverage and exclusivity (.5)
08/18/20	R. Millner	0.30	240.00	INS	Review materials from Lockton regarding Old Republic claims and collateral review.
08/18/20	R. Millner	0.50	400.00	INS	Telephone conference with Robert Richards, BRG, Lockton, Tania Moyron, client regarding Marillac and other insurance issues.
08/18/20	R. Millner	0.30	240.00	INS	Telephone conference with Peg Anderson (Old Republic), Tania Moyron and Sam Maizel regarding Old Republic collateral review.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/20	R. Millner	0.20	160.00	INS	Telephone conference with Tania Moyron and Sam Maizel regarding Old Republic issues.
08/18/20	R. Richards	0.60	433.80	INS	Emails re potential buyer (0.2); call re same (0.4).
08/18/20	S. Maizel	0.30	240.00	INS	Telephone conference with R. Richards, etc. re Marillac issues.
08/18/20	T. Moyron	0.80	479.40	INS	Call with P. Anderson, et al. re ORIC re Marillac (.3); call with D. Galfus re insurance matters (.4); prepare emails to Lockton, et al. re background for Grobstein Teeple (.1).
08/19/20	T. Moyron	1.70	1,018.73	INS	Conference call with D. Galfus, R. Richards, et al. re insurance matters (.8); correspond with D. Galfus, et al., re insurance call (.2); call with potential buyer for Marillac (.2); analyze correspondence regarding content for presentation and prepare same (.2); conference call with A. Ruda, et al. Thomson insurance (.3).
08/19/20	R. Richards	1.00	723.00	INS	Review Marillac slides (0.2); call with David Galfus and Dentons re insurance wind down issues (0.4); prepare talking points and revise same for comments (0.4).
08/19/20	R. Millner	0.80	640.00	INS	Telephone conference with Moyron, BRG, Richards regarding insurance issues and post confirmation coverage.
08/19/20	R. Millner	0.20	160.00	INS	Telephone conference with Geoff Miller regarding research as to insurance objections.
08/19/20	R. Millner	0.20	160.00	INS	Read emails from Robert Richards and Tania Moyron regarding issues as to post confirmation insurance.
08/19/20	R. Millner	0.20	160.00	INS	Emails to Lisa Well, Tania Moyron, Sam Maizel et al regarding current version of Old Republic program agreement.
08/19/20	G. Miller	0.20	88.40	INS	Review Old Republic Program Agreement and email R. Millner re same.
08/19/20	G. Miller	2.50	1,105.00	INS	Research re obligation to purchase tail insurance.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	G. Miller	0.60	265.20	INS	Research re obligation to purchase tail insurance.
08/20/20	R. Richards	1.50	1,084.50	INS	Review comments on talking points (0.3); revise and circulate talking points (0.3); call with Lisa Wall of Lockton (0.2); call with Liquidating Trustee (0.7).
08/20/20	R. Millner	0.20	160.00	INS	Email to Lisa Wall regarding ORIC status.
08/20/20	T. Moyron	0.30	179.78	INS	Analyze Marillac presentation substantive points and related correspondence from Lockton, et al.
08/21/20	T. Moyron	0.30	179.78	INS	Conference call with T. Conner, K. Chapman, et al. re insurance.
08/21/20	T. Moyron	0.80	479.40	INS	Analyze matters related to insurance and tail and case law (.6); analyze related correspondence and prepare response to same (.2).
08/21/20	R. Millner	0.20	160.00	INS	Review G. Miller research re tail insurance requirements under bankruptcy law.
08/21/20	G. Miller	3.10	1,370.20	INS	Research re obligation to purchase tail insurance.
08/21/20	S. Maizel	0.50	400.00	INS	Review and respond to emails re tail insurance obligations, including review of Hahnemann briefs.
08/21/20	R. Barbarowicz	0.50	357.00	INS	Review of Marillac proposal from Randall & Quiller.
08/21/20	R. Barbarowicz	0.60	428.40	INS	Review of program agreement with Old Republic Insurance Company.
08/22/20	R. Barbarowicz	0.90	642.60	INS	Communications with Mr. Richards, Mr. Millner, Ms. Moyron and Mr. Miller regarding tail coverage issue.
08/22/20	R. Barbarowicz	0.50	357.00	INS	Conference call with Ms Moyron regarding tail coverage issue.
08/22/20	R. Barbarowicz	2.60	1,856.40	INS	Review of Hahnemann briefs regarding duty to procure tail or extended reporting coverage.
08/22/20	G. Miller	5.90	2,607.80	INS	Research California law re obligation to purchase tail insurance.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/22/20	R. Richards	1.60	1,156.80	INS	Review existing research and briefing from other cases on tail policies (1.1); follow up emails re additional research (0.3); call with Moyron and Barbarowicz re California state law research (0.2).
08/23/20	R. Barbarowicz	0.60	428.40	INS	Confer with Mr. Miller regarding research for duty in California to procure extended reporting coverage absent a contractual duty.
08/23/20	R. Barbarowicz	0.80	571.20	INS	Communication to team regarding preliminary conclusion that debtor does not have a duty to purchase extended reporting coverage on claims made policies as a matter of California law absent a contractual duty.
08/23/20	R. Barbarowicz	2.40	1,713.60	INS	Review of California law provisions relating to claims made policies, review of other resources.
08/24/20	R. Richards	0.20	144.60	INS	Revise tail insurance talking points.
08/24/20	G. Miller	3.00	1,326.00	INS	Draft legal memorandum re obligation to purchase tail insurance.
08/24/20	R. Barbarowicz	1.40	999.60	INS	Review of materials from Lockton regarding extended reporting coverage options and related materials.
08/24/20	R. Barbarowicz	1.20	856.80	INS	Review and revise memo on tail coverage obligations.
08/24/20	R. Barbarowicz	0.60	428.40	INS	Review of revised talking points, from Mr. Richards
08/24/20	R. Barbarowicz	0.40	285.60	INS	Review of additional revisions to Marrilac presentation from Ms. Wall.
08/24/20	R. Millner	0.10	80.00	INS	Review R. Richards email re tail insurance talking points.
08/24/20	J.A. Moe, II	0.10	59.93	INS	Review E-Mails including from Nam Nguyen on ERP Extension Endorsements for D & O Liability Insurance.
08/25/20	R. Millner	0.10	80.00	INS	Review R. Richards slides re insurance issues.
08/25/20	R. Millner	0.20	160.00	INS	Email to R. Richards et al re Old Republic collateral review.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	R. Richards	0.60	433.80	INS	Review comments on insurance slides (0.2); update and forward same (0.3); emails re Marillac sales process (0.1).
08/25/20	T. Moyron	0.90	539.33	INS	Analyze insurance slides and prepare comments regarding same (.7); analyze correspondence related to same (.2).
08/25/20	C. Montgomery	0.30	240.00	INS	Phone call with T Moyron and D Galfus regarding insurance issues and review chart.
08/26/20	R. Richards	0.80	578.40	INS	Call with insurance slides (0.7); emails re Marillac sale (0.1).
08/26/20	R. Millner	0.10	80.00	INS	Review revised insurance slides provided by R. Richards.
08/26/20	R. Millner	0.10	80.00	INS	Email T. Moyron et al re comments on insurance slides.
08/26/20	T. Moyron	1.30	779.03	INS	Call with D. Galfus and S. Maizel re insurance matters (.2); call with R. Adcock re insurance matters (.1); call with D. Galfus, R. Adcock, R. Richards, et al. re insurance matters (1.0).
08/27/20	R. Millner	0.10	80.00	INS	Review revised slides with regard to Marillac transaction and Verity insurance.
08/27/20	R. Richards	0.80	578.40	INS	Emails re Marillac bidder status (0.1), review revised Lockton slides (0.2), revise and circulate tail insurance slide (0.5).
08/28/20	R. Richards	0.30	216.90	INS	Emails re bid status, board presentation materials.
08/29/20	R. Richards	0.30	216.90	INS	Review offer letters.
08/30/20	R. Richards	0.50	361.50	INS	Revise and circulate slides on tail insurance (0.2); emails with Lockton re Lockton slides (0.1); respond to Garms questions and review draft board resolutions (0.2).
08/30/20	R. Millner	0.20	160.00	INS	Read bids for acquisition of ownership of Marillac.
08/30/20	R. Barbarowicz	0.60	428.40	INS	Review proposal from Taussig Capital and Annapolis Consulting Group to acquire Marrillac Insurance Company Limited.
08/30/20	R. Barbarowicz	0.70	499.80	INS	Compare proposal from ACG Taussig with final offer of Randall & Quilter Investment Holdings Ltd.

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/20	R. Barbarowicz	0.30	214.20	INS	Review of revised presentation materials for extended coverage and Marillac.
08/30/20	T. Moyron	0.20	119.85	INS	Analyze correspondence regarding Marillac bids.
08/31/20	S. Maizel	3.40	2,720.00	INS	Telephone conference with R. Adcock, BRG, Lockton, etc. re Marillac sales issues (9); telephone conference with Mintz Levin, Houlihan Lokey, etc. re same (.9); telephone conference with Lockton, R&Q, etc. re same (.6); telephone conference with Lockton, ACG, etc. re same (.4); telephone conference with R. Adcock, Lockton, BRG, etc. re same (.6).
08/31/20	R. Richards	2.60	1,879.80	INS	Follow up call with bidder one (0.5); follow up call with bidder two (0.4); revise board slides for tomorrow (0.2); review and circulate current draft of Marillac Stock Purchase Agreement (0.6) and sale motion (0.4); further conference call with client and team re Marillac sale (0.5).
08/31/20	R. Barbarowicz	0.80	571.20	INS	Conference call with Mr. Richards, Ms. Moyron, Mr. Connor, Ms. Wall, Mr. Adcock, Mr. Galfus and others to discuss extended coverage issue, proposal of Taussig and Annapolis Consulting Group and final offer of Randall & Quilter Investment Holdings Ltd.
08/31/20	T. Moyron	3.20	1,917.60	INS	Conference call with Lockton, BRG, R. Adcock, etc. Marillac and offers (.9); analyze emails from L. Wall, et al. re same (.4); conference call with BRG, Mintz, Lockton, R. Richards, et al. re background and offers (.9); analyze L. Wall, et al. emails re calls with bidders (.1); call with Lockton, R. Addock, et al. re discussions with buyers and next steps (.7); analyze R. Richards correspondence re slides (.2).
08/31/20	T. Moyron	0.20	119.85	INS	Analyze matters related to tail and related correspondence.
08/31/20	R. Richards	1.60	1,156.80	INS	Review updated chart (0.1); call with David Galfus re same (0.2); follow up emails re same (0.1); internal call re Marillac sale (0.8); call with Mintz Levin and Houlihan re Marillac Sale (0.4).



Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	T. Moyron	0.30	179.78	INS	Analyze L. Wall, et al. correspondence regarding Marillac offer and status.
09/02/20	T. Moyron	1.10	659.18	INS	Analyze matters related to Marillac sale and timeline and comment re same (.3); analyze email from D. Galfus re insurance matters and attached slides (.2) and further correspondence regarding same (.3); analyze L. Wall email re buyer (.1); analyze correspondence regarding SPA and other underlying documents (.2).
09/02/20	S. Maizel	0.40	320.00	INS	Telephone conference with Lockton, etc. re sale of Marillac.
09/03/20	R. Richards	3.00	2,169.00	INS	Review comments on Stock Purchase Agreement (0.2), review disclosure schedules for SPA (0.3), revise and circulate SPA (0.5), prepare for board call on Marillac sale (0.5), participate in board call (1.4); follow up emails with Lockton (0.1).
09/03/20	R. Millner	0.20	160.00	INS	Review Marillac sale draft and email R. Richards re Old Republic assignment.
09/03/20	R. Barbarowicz	1.20	856.80	INS	Review of draft of stock purchase agreement.
09/03/20	S. Maizel	0.50	400.00	INS	Telephone conference with R. Adcock, etc. re insurance issues.
09/03/20	C. Montgomery	3.80	3,040.00	INS	Participate in conference call T Moyron, R Adcock, P Chadwick re insurance reserves and effective date budget (.5); participate in conference call with Mintz, BRG, Dentons, regarding funds flow and Effective Date payments (.4); communications with T Moyron, J Emerson and R Amkraut regarding ML releases (.4) ; phone call Ryan Westhoff regarding use of CTT (.1) ; communications with B Lewis and R Westhoff re escrow (.1); communication with T Moyron regard sharing glow of funds with plan proponents (.1) ; phone call with T Moyron re post effective Liquidating Trust issues (.4); review J Robles decision re 7052 and SGM (.2); phone call with R Amkraut regarding Swinerton lien (.3); phone call with C Richter regarding UMB Bank delay (.2); participate in Dentons,

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					BRG , Milbank, FTI and H Grobstein regarding funds and budgets ( .6); phone call A Korda re Jones Day Fees (.3); communications with C Richter I Hammel and B Klien re Klien releases (.2)
09/03/20	J. Fisher	1.00	378.00	INS	Work on Marillac SPA and related matters.
09/04/20	J. Fisher	0.70	264.60	INS	Revise Marillac SPA; correspondence regarding transaction.
09/04/20	S. Maizel	0.30	240.00	INS	Telephone conference with Richard Corbi re Marillac sale (.1); review and respond to emails re same (.2).
09/04/20	G. Miller	1.60	707.20	INS	Revise Marillac sale motion.
09/04/20	T. Moyron	0.80	479.40	INS	Analyze emails from BRG, et. al. and SPA, etc.
09/04/20	R. Barbarowicz	1.20	856.80	INS	Review of revised draft of stock purchase agreements and related draft documents.
09/04/20	R. Barbarowicz	0.20	142.80	INS	Communication with Messrs. Richards. Maizel and Ms. Moyron regarding review of drafts.
09/04/20	R. Richards	4.30	3,108.90	INS	Review comments on Stock Purchase Agreement (0.3); review drafts of exhibits and closing documents (0.4); revise and circulate Stock Purchase Agreement (0.8); emails re ACG inquiries (0.2); revise sale motion (1.8); revise sale order (0.8).
<b>Subtotal</b>		<b>105.00</b>	<b>67,996.64</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	G. Medina	0.40	117.30	MED/DHCS	Review and file Stipulation By Verity Health System of California, Inc. and AHMC Healthcare Inc. and California Department of Health Care Services regarding Assumption and Assignment of Medi-Cal Provider and upload order.
08/18/20	A. Ruegger	1.50	1,200.00	MED/DHCS	Review source documents re 2015 DCHS transaction.
08/19/20	A. Ruegger	0.30	240.00	MED/DHCS	Analyze documents re 2015 DCHS transaction.
08/27/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails from Ken Wang re DHCS issues.
	Subtotal	2.40	1,717.30		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**REP - Reporting**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	N. Koffroth	1.40	702.10	REP	Draft monthly operating report for July 2020.
	<b>Subtotal</b>	<b>1.40</b>	<b>702.10</b>		

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	3,890.05
B100	Administration	5,254.86
B110	Case Administration	15,576.28
B120	Asset Analysis and Recovery	4,177.68
B130	Asset Disposition	42,168.20
B140	Relief from Stay/Adequate Protection Proceedings	75.23
B150	Meetings of and Communications with Creditors	4,168.40
B160	Fee/Employment Applications	26,824.40
	Less Discount to Client	(12,965.00)
B180	Avoidance Action Analysis	185,691.82
B185	Assumption/Rejection of Leases and Contracts	2,785.43
B190	Other Contested Matters (excl. assumption/rejection motions)	5,248.06
B200	Operations	179.78
B210	Business Operations	1,387.76
B220	Employee Benefits/Pension	4,474.90
B230	Financing/Cash Collections	3,777.69
B240	Tax Issues	59.93
B250	Real Estate	5,706.08
B260	Board of Directors Matters	2,918.36
B300	Claims and Plan	107,293.41
B310	Claims Administration and Objections	5,523.50
B320	Plan and Disclosure Statement (incl. Business Plan)	405,301.81
EMP	Employee matters	11,021.56
INS	Insurance	67,996.64
MED/DHCS	Medi-Cal/DHCS Issues	1,717.30
REP	Reporting	702.10
	Total This Matter	\$913,921.23

Verity Health System of California, Inc.  
Matter: 15800425-000003  
Invoice No.: 2321656

September 30, 2020

Total This Matter

\$900,956.23

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$800.00	127.00	\$101,600.00
L. Harrison	\$800.00	114.30	\$91,440.00
O. Pinkas	\$800.00	0.20	\$160.00
S. Alberts	\$800.00	9.50	\$7,600.00
S. Maizel	\$800.00	72.00	\$57,600.00
S. Martin	\$760.75	12.10	\$9,205.10
J. Kattan	\$800.00	2.00	\$1,600.00
L. Whidden	\$765.50	84.30	\$64,531.65
R. Garms	\$603.50	17.20	\$10,380.20
R. Richards	\$723.00	63.00	\$45,549.00
R. Westhoff	\$468.00	11.00	\$5,148.00
S. McCandless	\$799.00	6.70	\$5,353.30
S. Walker	\$800.00	3.10	\$2,480.00
T. Moyron	\$599.25	229.70	\$137,648.13
J.A. Moe, II	\$599.25	93.40	\$55,970.38
C. Richter	\$646.00	36.60	\$23,643.60
K. Murphy	\$416.50	9.40	\$3,915.10
R. Barbarowicz	\$714.00	18.60	\$13,280.40
A. Ruegger	\$800.00	17.00	\$13,600.00
R. Millner	\$800.00	9.80	\$7,840.00
M. Zeefe	\$480.25	142.90	\$68,627.91
A. Shiran	\$514.50	7.80	\$4,013.10
C. Doherty, Jr.	\$374.00	0.20	\$74.80
G. Miller	\$442.00	27.40	\$12,110.80
J. Fisher	\$378.00	4.50	\$1,701.00
L. Macksoud	\$437.75	5.20	\$2,276.30

Verity Health System of California, Inc  
Invoice #: 2321656

September 30, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
N. Koffroth	\$501.50	171.20	\$85,856.80
A. Huddleston	\$522.75	1.20	\$627.30
S. Schrag	\$336.00	2.10	\$705.60
A. Minton	\$437.75	0.80	\$350.20
A. Ring	\$382.50	9.60	\$3,672.00
D. Cook	\$471.76	16.50	\$7,784.05
J. DiChiara	\$429.25	19.80	\$8,499.15
T. Koshak	\$429.25	23.50	\$10,087.38
D. Pina	\$318.75	25.40	\$8,096.27
G. Medina	\$293.25	85.50	\$25,072.93
J. Kim	\$263.50	4.00	\$1,054.00
K.M. Howard	\$250.75	49.60	\$12,437.34
M.M. Welch	\$267.75	<u>8.70</u>	<u>\$2,329.44</u>
Totals		1,542.80	\$913,921.23

Fee Total	\$ 900,956.23
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Invoice Total	<u>\$ 900,956.23</u>
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DENTONS

Main Document

Page 140 of 228

Dentons US LLP  
1100 California Street, Suite 2500  
Los Angeles, California 90017-5704

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321655**

Client/Matter: 15800425-000003

Verity Health System of California

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Payment Due Upon Receipt

Total This Invoice

\$ 23,573.61

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S. Maizel  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321655**

Client/Matter: 15800425-000003

Verity Health System of California

#### DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/4/2020	Filing Fees Karleen F. Murphy, 8/4/20: NATALIE NGUYEN V. SFMC COURT DOC	9.00
8/3/2020	Filing Fees Karleen F. Murphy, 8/3/20: CYTHIA SORTO v. SFMC COURT DOCS	5.00
8/5/2020	Filing Fees Karleen F. Murphy, 8/5/20: LACOURT CONNECT MORATYA v. SFMC Status Conference	15.00
8/3/2020	Filing Fees Karleen F. Murphy, 8/5/20: LACOURT CONNECT ARAGON v. SFMC STATUS CONFERENCE	15.00
8/2/2020	Filing Fees Tania M. Moyron, Appearance at July 29, 2020 Verity hearing by Tania Moyron by CourtCall.	26.25
8/2/2020	Filing Fees Tania M. Moyron, Appearance at July 29, 2020 Verity hearing by Peter Chadwick by CourtCall.	26.25
9/4/2020	Filing Fees ACE ATTORNEY INVOICE 343112 9/04/20 PORTAL FEE TO SOUTH CENTRAL DISTRICT COMPTON1881211REQUEST FOR DISMISSA	9.75
9/1/2020	Filing Fees John A. Moe, II, Telephonic attendance at hearing regarding Cho vs. Verity Health System of California	15.00
8/28/2020	Filing Fees Tania M. Moyron, Attendance at July 29, 2020 Verity hearing by CourtCall by Sam Alberts.	31.85
9/1/2020	Filing Fees ACE ATTORNEY INVOICE 343112 9/01/20 PDF MESSENGER ASAP TO LEVENE, NEALE BENDER YOU & BRI1880276DROP SERVE **MUST CALL BACK!!!!	61.15
9/1/2020	Filing Fees ACE ATTORNEY INVOICE 343112 9/01/20 PDF MESSENGER ASAP TO BARNES & THORNBURG 1880281DROP SERVE **MUST CALL BACK!!!!	61.15
8/31/2020	Filing Fees ACE ATTORNEY INVOICE 343112 8/31/20 PDF FILING RUSH TO USDC 1879864MAIL IN 3 CHECKS FORPAYMENT OF 3 PRO HAC	1,614.13
9/2/2020	Filing Fees ACE ATTORNEY INVOICE 343112 9/02/20 PDF FILING SD TO LASC-COMPTON 1880775REQ. FOR DISMISSAL	82.45

Verity Health System of California

September 30, 2020

Matter: 15800425-000003

Invoice No.: 2321655

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/21/2020	Filing Fees ACE ATTORNEY INVOICE 340748 8/21/20 PORTAL FEE TO CENTRAL DISTRICT SPRING STREET1877075STATUS REPORT	16.90
9/1/2020	Filing Fees ACE ATTORNEY INVOICE 340748 9/01/20 PORTAL FEE TO CENTRAL DISTRICT STANLEY MOSK 1879991AFFIDAVIT (NAME EXTE	16.90
8/20/2020	Filing Fees ACE ATTORNEY INVOICE 340748 8/20/20 PDF CHAMBER'S COPY SAMEDY TO LASC-SPRING ST. COURTHOUSE 1876942STATEMENT DEL CCJ SSC-32	41.53
8/22/2020	Filing Fees ACE ATTORNEY INVOICE 340748 8/22/20 PORTAL FEE TO CENTRAL DISTRICT SPRING STREET1877464RESPONSE (NAME EXTEN	16.90
8/31/2020	Filing Fees ACE ATTORNEY INVOICE 340748 8/31/20 PDF FILING SD TO LASC-COMPTON 1879966REQ. FOR DISMISSAL	82.45
9/3/2020	Filing Fees ACE ATTORNEY INVOICE 340748 9/03/20 PORTAL FEE TO SOUTH CENTRAL DISTRICT COMPTON1880812REQUEST FOR DISMISSA	9.75
8/11/2020	Filing Fees ACE ATTORNEY INVOICE 338176 8/11/20 MOBILE NOTARY PUBLIC TO 1874352PREFORM NOTARY IN SANTA MONICA AT 1PM	382.50
8/12/2020	Filing Fees ACE ATTORNEY INVOICE 338176 8/12/20 PDF FILING RUSH TO 1874460SUPP STATEMENT FILE & CCJ D-7	109.28
8/13/2020	Filing Fees ACE ATTORNEY INVOICE 338176 8/13/20 MOBILE NOTARY PUBLIC TO 1874851TO RICH ADCOCK ASAP 1 MORE DOC	127.50
8/19/2020	Filing Fees Samuel R. Maizel, Courtcall telephonic appearance fee re 7/8/20 hearing (Maizel).	26.25
8/16/2020	Filing Fees Samuel R. Maizel, Courtcall telephonic appearance fee re 8/12/20 hearing (Adcock)	93.45
8/16/2020	Filing Fees Samuel R. Maizel, Courtcall telephonic appearance fee re 8/12/20 hearing (Maizel)	82.25
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Claude Montgomery at hearing on August 12, 2020 in Verity.	99.05
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Malka Zeefe at hearing on August 12, 2020 in Verity.	93.45
8/16/2020	Filing Fees Nicholas Koffroth, Attendance by Nick Koffroth at August 12, 2020 hearing in Verity.	93.45
8/6/2020	Filing Fees ACE ATTORNEY INVOICE 338176 8/06/20 PDF FILING SD TO 1873009STMNT RE NON- APPEARFILE AND CCJ TO D.7	110.70
8/6/2020	Filing Fees ACE ATTORNEY INVOICE 338176 8/06/20 EFILING PRIORITY TO 1873013FURTHER CMC **MUST CALL BACK!!!!	68.05

Verity Health System of California

September 30, 2020

Matter: 15800425-000003

Invoice No.: 2321655

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/6/2020	Filing Fees ACE ATTORNEY INVOICE 338176 8/06/20 PDF CHAMBER'S COPY SAMEDY TO 1873016FURTHER CMC **MUST CALL BACK!!!!	171.75
8/17/2020	Filing Fees Tania M. Moyron, Attendance by David Galfus at hearing on April 1, 2020 in Verity.	87.85
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Tania Moyron at hearing on August 12, 2020 in Verity.	93.45
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Peter Chadwick at hearing on August 12, 2020 in Verity.	93.45
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Hope Levy-Biehl at hearing on August 12, 2020 in Verity.	87.85
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Sonia Martin at hearing on August 12, 2020 in Verity.	93.45
8/16/2020	Filing Fees Tania M. Moyron, Attendance by Henry Kevane at hearing on August 12, 2020 in Verity.	93.45
8/2/2020	Filing Fees Nicholas Koffroth, Appearance at July 29, 2020 hearing in Verity by Nick Koffroth by CourtCall.	26.25
8/2/2020	Filing Fees Samuel R. Maizel, Courtcall fees re Jan. 29 hearing (Maizel).	26.25
8/2/2020	Filing Fees Samuel R. Maizel, Courtcall fees re Jan. 29 hearing Adcock).	26.25
8/12/2020	Filing Fees George L. Medina, Confirmation Hearing Telephonic Appearance	82.25
8/13/2020	Filing Fees John A. Moe, II, Attendance at telephonic hearing August 10, 2020	26.25
8/14/2020	Filing Fees Tania M. Moyron, Attendance by Tania Moyron at hearing on April 1, 2020 in Verity.	65.45
	SUBTOTAL	4,416.29
8/24/2020	Lexis COOK\ DAVID	49.38
8/25/2020	Lexis COOK\ DAVID	49.38
8/25/2020	Lexis COOK\ DAVID	98.77
8/26/2020	Lexis COOK\ DAVID	49.38
8/27/2020	Lexis MOYRON\ TANIA	50.07
8/31/2020	Lexis COOK\ DAVID	102.80
9/3/2020	Lexis ROSS\ RACHEL	297.00
	SUBTOTAL	696.78

Verity Health System of California

September 30, 2020

Matter: 15800425-000003

Invoice No.: 2321655

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/6/2020	Outside Professional Services California Good Standings for Seton Medical Center, St. Francis Medical Center, Verity Health System of California, Inc., and Verity Holdings, LLC.	272.00
4/13/2020	Outside Professional Services Dentons Bingham Greenebaum invoice 4469033 for professional services rendered in April 2020.	45.28
	SUBTOTAL	317.28
	Print/Color Copies Color	3.20
	SUBTOTAL	3.20
	Print/Copies BW	2.90
	SUBTOTAL	2.90
8/17/2020	Transcript Samuel R. Maizel, Transcript of proceedings re 8/12 confirmation hearing.	917.50
	SUBTOTAL	917.50
8/1/2020	WESTLAW ZEEFE \ MALKA	129.32
8/1/2020	WESTLAW ZEEFE \ MALKA	514.66
8/2/2020	WESTLAW RING \ ASHLEY	844.00
8/2/2020	WESTLAW ZEEFE \ MALKA	1,406.94
8/2/2020	WESTLAW SCHRAG \ SARAH	75.00
8/3/2020	WESTLAW RING \ ASHLEY	300.00
9/3/2020	WESTLAW PARK\JAE	225.00
9/4/2020	WESTLAW PARK\JAE	441.00
8/26/2020	WESTLAW HSU\ISABELLA	183.00
8/30/2020	WESTLAW MACKSOUD\LAUREN	900.00
8/31/2020	WESTLAW ZEEFE\MALKA	75.00
8/31/2020	WESTLAW COOK\DAVID F	2,813.60
8/31/2020	WESTLAW HUDDLESTON\ASHLEY	75.00
9/2/2020	WESTLAW KOFFROTH\NICHOLAS	225.00
8/25/2020	WESTLAW COOK\DAVID F	2,777.08
8/26/2020	WESTLAW COOK\DAVID F	1,956.04
8/27/2020	WESTLAW COOK\DAVID F	603.96
8/28/2020	WESTLAW COOK\DAVID F	279.32

Verity Health System of California

September 30, 2020

Matter: 15800425-000003

Invoice No.: 2321655

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/29/2020	WESTLAW ZEEFE\MALKA	150.00
8/29/2020	WESTLAW COOK\DAVID F	757.92
8/12/2020	WESTLAW MACKSOUD \ LAUREN	98.41
8/5/2020	WESTLAW HSU \ ISABELLA	75.00
8/14/2020	WESTLAW HSU \ ISABELLA	61.00
8/17/2020	WESTLAW MACKSOUD\LAUREN	375.00
8/22/2020	WESTLAW KOFFROTH\NICHOLAS	75.00
8/24/2020	WESTLAW MACKSOUD\LAUREN	150.00
8/3/2020	WESTLAW ZEEFE \ MALKA	922.79
8/4/2020	WESTLAW KOFFROTH \ NICHOLAS	27.00
8/4/2020	WESTLAW ZEEFE \ MALKA	28.62
8/4/2020	WESTLAW MACKSOUD \ LAUREN	375.00
8/10/2020	WESTLAW KOFFROTH \ NICHOLAS	75.00
8/10/2020	WESTLAW ZEEFE \ MALKA	225.00
SUBTOTAL		17,219.66
Total Disbursements		\$23,573.61
Disbursement Total		\$ 23,573.61
Invoice Total		<u>\$ 23,573.61</u>

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321657**

Matter: 15800425-000004  
O'Connor Hospital

Payment Due Upon Receipt

Total This Invoice

\$ 4,161.29

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Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
 2040 E. Mariposa Avenue  
 El Segundo, CA 90245  
 USA

September 30, 2020

Invoice No. 2321657

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000004  
 O'Connor Hospital

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	K. Murphy	0.10	41.65	B190	/ Estrada / Analyze email from defense litigation counsel re case update.
08/06/20	K. Murphy	0.10	41.65	B190	/ Thomson / Analyze case update.
08/13/20	K. Murphy	0.50	208.25	B190	/ Greenwood / Analyze email from Elina Tilman enclosing amended DFEH charge and AIG coverage letter and analyze enclosed documents (.1); confer with Elina Tilman re insurance coverage position (.1); and prepare update to Verity Litigation Management Charts re the same. (.3).
08/18/20	K. Murphy	1.20	499.80	B190	/ Garcia / Prepared for attending Status Conference by analyzing Status Conference Statement (.1); attend conference (1.0); prepare report and update to Verity Litigation Deadline Chart re the same (.1).
08/18/20	J.A. Moe, II	0.10	59.93	B190	/Esmeralda Garcia v. O'Connor/ Confer with Karleen Murphy on the status of the Bankruptcy Cases, for presentation at Case Management Conference.
08/18/20	J.A. Moe, II	0.20	119.85	B190	/Denise Greenwood v. O'Connor/ Review complaint asserting sexual harassment, that occurred on or before May 18, 2018 (.10); exchange multiple E-Mails with Elina Tilman and Karleen Murphy on perpetration nature of the assertions and AIG payment of SIR (.10).
08/18/20	J.A. Moe, II	0.20	119.85	B190	/Diem Cao v. O'Connor/ Telephone call from Jessica Cynoweic, on Stipulation and Order on relief from stay, then review potential payment as a general unsecured creditor above insurance.

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2321657

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/19/20	J.A. Moe, II	0.80	479.40	B190	/Sydney Thomson v. O'Connor/ Review E-Mails on conferring on impact of Chapter 11 Plan on ongoing litigation (.10); E-Mail to and telephone call returned to Elina Tilman on impact of Plan (.10); conference telephone call with An Ruda and Karen Chapman, on multiple insurance carriers providing insurance as to different components of the assertions (.60).
08/19/20	J.A. Moe, II	0.10	59.93	B190	/Denise Greenwood v. O'Connor/ Review with Karleen Murphy the status of the Claim and the postpetition issue arising in connection with the SIR.
08/19/20	K. Murphy	0.20	83.30	B190	/ Greenwood/ Analyze multiple emails from Elina Tilman and John Moe re pre or post petition status (.1); and confer with John Moe re the same and update chart (.1).
08/21/20	K. Murphy	0.20	83.30	B190	/ Thomson / Confer with John Moe re employment litigation aspect of matter (.1); and prepare edits to Verity Litigation Management Chart re same (.1).
08/26/20	K. Murphy	0.30	124.95	B190	/ CT Corporation-Pierini / Analyze multiple CT Corporation notices re subpoenas (.1); confer and coordinate with Elina Tilman re reporting to the Verity Team re same (.1); and analyzed Elina Tilman's emails re multiple subpoenas to Verity Team (.1).
09/01/20	K. Murphy	0.10	41.65	B190	/ CT Corp - Janice Pierini / Analyze CT Corp Notice of service of subpoena for records and email from Elina Tilman to Verity Team re same.
09/02/20	K. Murphy	0.10	41.65	B190	/ janice Pierini / Analyze email from Elina Tilman conveying settlement demand.
09/04/20	J.A. Moe, II	0.20	119.85	B190	/Janice Pierini v. O'Connor/ Review Karen Chapman's E-Mail and letter form Alan Zhao at AIG on issue of coverage for the claim (.10); review Settlement Demand on amount and dates (2019 - 2020) of alleged actionable conduct (.10).



O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2321657

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	K. Murphy	0.70	291.55	B190	/ Janice Pierini / Analyze multiple emails from Karen Chapman, John Moe, and Elina Tilman re settlement demand and case facts (.1); telephone call to John Moe re same (.1); review settlement demand letter with case facts (.1); and prepare new case summary for Verity Litigation Management Charts (.4).
09/04/20	K. Murphy	0.20	83.30	B190	/ Janice Pierini / Analyze email from Karen Chapman with AIG coverage letter and analyze letter (.1); and prepare update to Verity Chart with coverage and claim information (.1).
09/04/20	K. Murphy	0.10	41.65	B190	/ Janice Pierini / Confer with John Moe and Elina Tilman re AIG coverage letter and coverage position.
<b>Subtotal</b>		<b>5.40</b>	<b>2,541.51</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2321657

September 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	J.A. Moe, II	0.30	179.78	B300	In regard to Grievance Claims: Telephone call from Elina Tilman and Nick Koffroth, on Grievance Claims in regard to O'Connor and Saint Louise (.10); telephone call to Karleen Murphy on analysis of Grievance Claims (.10); telephone call returned to Elina Tilman on Grievance Claims (.10).
	<b>Subtotal</b>	<b>0.30</b>	<b>179.78</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2321657

September 30, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to email from K. Wang re EHR obligation.
08/21/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails from K. Wang re DHCS payments from escrow.
08/24/20	S. Maizel	0.10	80.00	MED/DHCS	Telephone conference with Ken Wang re DHCS demand for payment from escrow.
08/24/20	S. Maizel	0.20	160.00	MED/DHCS	Review and respond to emails from Ken Wang re DHCS demands against escrow.
08/24/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails from BRG re DHCS demands.
08/25/20	S. Maizel	0.10	80.00	MED/DHCS	Review and respond to emails from Ken Wang re demand against SCC escrow for DHCS.
09/02/20	S. Maizel	0.70	560.00	MED/DHCS	Telephone conference with F. Sze re DHCS litigation (.1); review O'Connor - DHCS settlement and email K. Wang re same (.6).
09/03/20	S. Maizel	0.30	240.00	MED/DHCS	Telephone conference with Ken Wang re pending appeal vis-à-vis settlement (.1); review and respond to emails re same (.2).
<b>Subtotal</b>		<b>1.80</b>	<b>1,440.00</b>		

O'Connor Hospital  
Matter: 15800425-000004  
Invoice No.: 2321657

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B190	Other Contested Matters (excl. assumption/rejection motions)	2,541.51
B300	Claims and Plan	179.78
MED/DHCS	Medi-Cal/DHCS Issues	1,440.00
Total This Matter		\$4,161.29

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
S. Maizel	\$800.00	1.80	\$1,440.00
J.A. Moe, II	\$599.25	1.90	\$1,138.59
K. Murphy	\$416.50	3.80	\$1,582.70
Totals		7.50	\$4,161.29
Fee Total		\$	4,161.29
Invoice Total		\$	<u>4,161.29</u>

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Page 163 of 328

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321658**

Matter: 15800425-000005  
St. Vincent Medical Center

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Total This Invoice	\$ 7,057.00
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S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
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 El Segundo, CA 90245  
 USA

September 30, 2020

**Invoice No. 2321658**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000005  
 St. Vincent Medical Center

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	K. Murphy	0.10	41.65	APP	/ Chow / Analyze plaintiff's notice of appeal.
08/31/20	K.M. Howard	0.40	100.30	APP	Analysis of Notice of Appeal in Lindsey Chow v. St. Vincent and reviewed and revised Critical Dates Memorandum.
	<b>Subtotal</b>	<b>0.50</b>	<b>141.95</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	C. Montgomery	0.30	240.00	B130	Communications with T Conner and H Levy Biehl regarding request for audited financial statements.
	<b>Subtotal</b>	<b>0.30</b>	<b>240.00</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**B160 - Fee/Employment Applications**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/17/20	C. Montgomery	0.50	400.00	B160	Phone conference with J Moloney, C Beith, T Moyron and S Maizel re SVMC fee.
	<b>Subtotal</b>	<b>0.50</b>	<b>400.00</b>		



St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	K.M. Howard	0.20	50.15	B185	Analysis of tentative ruling regarding Debtors' Motion to Approve Compromise to determine additional requirements and deadlines.
08/17/20	C. Montgomery	0.70	560.00	B185	Phone calls with N Koffroth, H Kevane and J Emerson regarding Premier Data Transfer rejection.
08/17/20	N. Koffroth	1.70	852.55	B185	Analyze issues concerning rejection of certain agreements and related settlement agreement provisions
08/18/20	N. Koffroth	1.20	601.80	B185	Attention to issues concerning rejection of agreements related to settlement agreement
<b>Subtotal</b>		<b>3.80</b>	<b>2,064.50</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K. Murphy	0.20	83.30	B190	Analyze letter from AIG re insurance coverage decision and email from Elina Tilman re the same (.1); and prepare update to Verity Chart re coverage (.1).
08/07/20	K. Murphy	0.10	41.65	B190	/ Hadley / Analyze case update from Karen Chapman.
08/07/20	K. Murphy	0.10	41.65	B190	/ Hadley / Analyze case update.
08/07/20	K. Murphy	0.10	41.65	B190	/ Ma / Analyze case update from litigation counsel.
08/11/20	K. Murphy	0.20	83.30	B190	/ CT Corp - Fuqua / Analyze CT Corp notice of subpoena, and download and analyze the same (.1); and draft email to Verity Team re the same (.1).
08/13/20	K. Murphy	0.10	41.65	B190	/ Ma / Analyze case update re settlement issues.
08/13/20	K. Murphy	0.30	124.95	B190	/ CT Corp - Martinez / Analyze CT Corp notice of service to SVMC, and analyze and download document (.1); research prior subpoena history and KFM emails to Verity Team following meet and confer with party serving subpoena re production date (.1); and draft email to Karen Chapman re overdue document production (.1).
08/14/20	J.A. Moe, II	0.70	419.48	B190	/Ok Ran Ma v. St. Vincent/ Review E-Mails from Karen Chapman, Louise Douville and Elspeth Paul on status of the case and questions (.10); research Order on relief from stay and Withdrawal of Claim (.20); telephone call with Karleen Murphy on status of the case (.10); E-Mail to Mss. Chapman, Douville and Paul on restrictions to insurance only and Withdrawal (.10); telephone call to Karen Chapman on potential actual recovery (.10); telephone call to Louise Douville on damage issues (.10).

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	K. Murphy	0.20	83.30	B190	/ Ma / Telephone call with John Moe re date of incident and complaint filing date (.1); and analyze emails from John Moe, Kathleen Conway, and Elspeth Paul re analysis of case value (.1).
08/14/20	K. Murphy	0.20	83.30	B190	/ CT Corp - Morales / Analyze CT Corp notice of subpoena, and download and analyze subpoena (.1); and draft email to Verity Team re the same (.1).
08/14/20	K. Murphy	0.10	41.65	B190	/ Mancilla / Prepare update to Verity Litigation Management Chart re case settlement.
08/14/20	K. Murphy	0.10	41.65	B190	/ Santos / Prepare update to Verity Litigation Management Chart re case closure.
08/14/20	K. Murphy	0.10	41.65	B190	/ Cho / Prepare draft of Status Conference Statement re Bankruptcy.
08/17/20	K. Murphy	0.10	41.65	B190	/ Mancilla / Analyze and respond to email from John Moe re case status.
08/17/20	J.A. Moe, II	0.10	59.93	B190	/Manuel Morales v. Fantasia Productions - St. Vincent/ Review Subpoena directed to St. Vincent and E-Mail to Karleen Murphy on Subpoenas.
08/17/20	J.A. Moe, II	0.10	59.93	B190	/Yolanda Mancilla v. St. Vincent/ Review Notice of upcoming trial date and E-Mail to Karleen Murphy on settlement of Litigation.
08/19/20	K. Murphy	0.20	83.30	B190	/ Cho/ Telephone call with John Moe re preparing edits to draft of Status Conference Statement re Bankruptcy (.1); and prepare second draft with required edits (.1).
08/19/20	J.A. Moe, II	0.10	59.93	B190	/Ok Ran Ma v. St. Vincent/ Review Notice of hearing and E-Mail to Karleen Murphy on status.
08/20/20	J.A. Moe, II	0.10	59.93	B190	/Mee Sook Cho v. St. Vincent/ Review upcoming Case Management Conference and E-Mail to Karleen Murphy on CMC.
08/21/20	K. Murphy	0.10	41.65	B190	/ O'Halleran/ Analyzed case update from litigation counsel and email from Karen Chapman re same.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/21/20	K. Murphy	0.20	83.30	B190	/ CT Corporation- Cruz/ Analyzed CT Corporation notice of service of subpoena (.1); and analyzed email from Elina Tilman to Verity Team re same (.1).
08/24/20	K. Murphy	0.10	41.65	B190	/ Cho / Analyze and respond to email from John Moe re upcoming case status conference.
08/24/20	K. Murphy	0.20	83.30	B190	/ Phi / Draft Status Conferene Statement re Bankruptcy for John Moe review.
08/24/20	J.A. Moe, II	0.10	59.93	B190	/Mee Sook Cho v. St. Vincent/ Review and confirm Case Management Conference on August 27th, and E-Mail to Karleen Murphy on last day to schedule telephonic appearance.
08/25/20	J.A. Moe, II	0.10	59.93	B190	/John Phi v. St. Vincent/ Review proposed Case Management Statement, and E-Mail to and telephone call from Karleen Murphy on one minor change to the CMC Statement.
08/26/20	J.A. Moe, II	0.10	59.93	B190	/Mee Sook Cho/ Telephone call from Karleen Murphy on, and prepare for appearance by telephone at Case Management Conference on August 27th.
08/27/20	J.A. Moe, II	0.70	419.48	B190	Prepare for hearing in the Superior Court, reviewing procedures and Case Management Conference Statement (.20); await and attend hearing in the Superior Court, with the Court continuing the hearing for a Trial Setting Conference and Status Conference on October 1st (.30); prepare Report on results of the hearing (.20).
08/27/20	K. Murphy	0.20	83.30	B190	/ Cho / Analyze and respond to email from John Moe in advance of Status Conference (.1); and analyze John Moe's report of the same and update Verity Deadline Chart with continued conference date. (.1).
08/27/20	K. Murphy	0.10	41.65	B190	/ Phi / Analyze and respond to emails from Derry Kalve re service of Status Conference Statement to pro per Plaintiff.
09/03/20	J.A. Moe, II	0.10	59.93	B190	/Yolanda Mancilla v. St. Vincent/ Review Notice of hearing on September 3rd, and E-Mail to Karleen Murphy on upcoming Case Management Conference.

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	K. Murphy	0.20	83.30	B190	/ Ma/ Analyze email from Karen Chapman enclosing multiple documents with case update (.1); and analyze multiple CCP 998 offers with letters from Plaintiffs (.1).
09/04/20	K. Murphy	0.60	249.90	B190	/ Warneck/ Analyze email from Karen Chapman enclosing new Summons and Complaint, demand letter, loss of earnings demand letter, medical bills demand, and analyze documents (.2); draft case summaries to include new matter on Verity Litigation Management Charts (.3); and draft email to John Moe re same (.1).
09/04/20	J.A. Moe, II	0.20	119.85	B190	/Ok Ran Ma v. St. Vincent/ Review Louise Douville's E-Mails with 998 Offers (.10); confer with Karleen Murphy on Case Management Conference (.10).
09/04/20	S. Maizel	0.10	80.00	B190	Review and respond to email from G. Kennedy re Emerald Textiles adversary proceeding
<b>Subtotal</b>		<b>6.30</b>	<b>3,100.95</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	S. Alberts	0.50	400.00	B220	Review draft communication to RPHE and provide comment (.2) and follow up (.1), emails with T. Conner and working group about payment of RPHE August 15, 2020 invoice (.2).
	<b>Subtotal</b>	<b>0.50</b>	<b>400.00</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	C. Doherty, Jr.	0.20	74.80	EMP	Prepare email re SVMC 1113 matters
08/06/20	C. Doherty, Jr.	0.10	37.40	EMP	Prepare email re SVMC 1113 matters
08/11/20	C. Doherty, Jr.	0.10	37.40	EMP	Prepare email re SVMC 1113 matters
	<b>Subtotal</b>	<b>0.40</b>	<b>149.60</b>		

St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**MED/CMS- Medicare/CMS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	S. Maizel	0.20	160.00	MED/CMS	Review and respond to emails from counsel for CMS re settlement of Medicare issues.
09/03/20	S. Maizel	0.20	160.00	MED/CMS	Review and respond to emails re CMS request to settle re SVMC.
09/03/20	S. Maizel	0.30	240.00	MED/CMS	Telephone conference with E. Levey, etc. re CMS claims.
	<b>Subtotal</b>	<b>0.70</b>	<b>560.00</b>		



St. Vincent Medical Center  
Matter: 15800425-000005  
Invoice No.: 2321658

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b>Task Code</b>	<b>Task Code Name</b>	<b>Fees</b>
APP	Appellate Proceedings	141.95
B130	Asset Disposition	240.00
B160	Fee/Employment Applications	400.00
B185	Assumption/Rejection of Leases and Contracts	2,064.50
B190	Other Contested Matters (excl. assumption/rejection motions)	3,100.95
B220	Employee Benefits/Pension	400.00
EMP	Employee matters	149.60
MED/CMS	Medicare/CMS Issues	560.00
Total This Matter		\$7,057.00

**TIME AND FEE SUMMARY**

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$800.00	1.50	\$1,200.00
S. Alberts	\$800.00	0.50	\$400.00
S. Maizel	\$800.00	0.80	\$640.00
J.A. Moe, II	\$599.25	2.40	\$1,438.25
K. Murphy	\$416.50	3.90	\$1,624.35
C. Doherty, Jr.	\$374.00	0.40	\$149.60
N. Koffroth	\$501.50	2.90	\$1,454.35
K.M. Howard	\$250.75	<u>0.60</u>	<u>\$150.45</u>
Totals		13.00	\$7,057.00

Fee Total \$ 7,057.00

Invoice Total \$ 7,057.00

The logo for Dentons, featuring the word "DENTONS" in white capital letters on a purple rectangular background.

Main Document

Page 176 of 228

SNR Denton US LLP  
1100 California Street  
Suite 2500  
Los Angeles, California 90017-5704

Alston Hunt Floyd & Ing is now  
Dentons -- continuing services  
throughout Hawai'i

dentons.com

Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321659**

Matter: 15800425-000006  
St. Francis Medical Center

Payment Due Upon Receipt

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Total This Invoice	\$ 244,442.99
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
 2040 E. Mariposa Avenue  
 El Segundo, CA 90245  
 USA

September 30, 2020

**Invoice No. 2321659**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000006  
 St. Francis Medical Center

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	T. Moyron	1.70	1,018.73	AGI	Call with J. Richlin and P. Chadwick re status of responding on proposal re AG (.2); call with advisors for 2005 re Prime and AG (1.0); call with M. Shinderman re AG (.3).
08/05/20	C. Montgomery	0.10	80.00	AGI	Communications with R Adcock and T Moyron regarding AG settlement demand.
08/06/20	T. Moyron	0.90	539.33	AGI	Analyze AG opposition (.7); prepare email to H. Levy-Biehl, et al. re same (.2).
08/06/20	N. Koffroth	3.20	1,604.80	AGI	Draft reply in support of motion to enforce sale order
08/07/20	S. Maizel	1.00	800.00	AGI	Review AG opposition to Enforcement Motion (.5); drafting sections of reply (.5).
08/07/20	N. Koffroth	3.30	1,654.95	AGI	Draft reply in support of emergency motion to authorize sale free and clear of Attorney General conditions
08/07/20	S. Martin	2.20	1,673.65	AGI	Review Attorney General Opposition and prepare response to state law issues and communicate with debtors' counsel regarding same.
08/07/20	M.L. Irel	3.80	1,938.00	AGI	Review attorney general opposition brief portions relating to state law defenses, and compare with prior filings in case, and draft memo detailing repetitive arguments, and color coding comparable arguments in multiple filings by the attorney general.
08/07/20	M.L. Irel	2.20	1,122.00	AGI	Draft reply to attorney general opposition brief.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	M.L. Irel	2.20	1,122.00	AGI	Review attorney general opposition brief portions relating to bankruptcy laws and compare with arguments in prior filing, and draft memo comparing and contrasting prior and current arguments made by attorney general.
08/08/20	S. Maizel	0.10	80.00	AGI	Telephone conference with T. Moyron re reply to AG opposition.
08/08/20	N. Koffroth	5.30	2,657.95	AGI	Draft reply in support of emergency motion to authorize sale free and clear of Attorney General conditions
08/08/20	S. Martin	3.10	2,358.33	AGI	Review record and draft state law section of Attorney General opposition and communicate with debtors' counsel regarding same.
08/08/20	T. Moyron	1.30	779.03	AGI	Analyze and prepare comments to reply re state law arguments re AG.
08/09/20	S. Martin	1.40	1,065.05	AGI	Review and comment on opposition to Attorney General objection.
08/09/20	T. Moyron	5.90	3,535.58	AGI	Analyze, prepare and finalize AG reply and correspond regarding same (5.7); correspond with J. Richlin regarding same (.2).
08/09/20	N. Koffroth	9.40	4,714.10	AGI	Draft reply in support of emergency motion to authorize sale free and clear of Attorney General conditions
08/09/20	S. Maizel	1.10	880.00	AGI	Review and respond to emails re reply to AG opposition.
08/09/20	S. Maizel	0.90	720.00	AGI	Drafting inserts for reply to AG opposition.
08/09/20	S. Maizel	0.80	640.00	AGI	Review and revise reply to AG opposition.
08/11/20	S. Martin	0.30	228.23	AGI	Review and analyze tentative ruling granting motion to sell free and clear without additional conditions imposed by Attorney General.
08/11/20	T. Moyron	0.50	299.63	AGI	Conference call with D. Eldan and J. Richlin re tentative and potential resolution.
08/11/20	S. Maizel	0.30	240.00	AGI	Review court's tentative on enforcement motion.
08/12/20	S. Martin	2.00	1,521.50	AGI	Review order granting sale motion.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	S. Maizel	3.30	2,640.00	AGI	Prep for hearing on enforcement motion re Attorney General (1.5); participate in hearing on enforcement motion (1.8).
08/12/20	N. Koffroth	2.70	1,354.05	AGI	Draft order approving motion to sell free and clear of attorney general conditions
08/12/20	S. Maizel	0.10	80.00	AGI	Review and revise draft order granting SFMC enforcement motion.
08/13/20	T. Moyron	1.00	599.25	AGI	Conference call with J. Richlin re settlement reached with AG (.1); conference call with R. Adcock and S. Maizel re Prime's settlement and request (.3); analyze and prepare stipulation (.3); correspond with J. Richlin (.2); analyze G. Gerlter email (.1).
08/13/20	S. Martin	0.20	152.15	AGI	Confer with T. Moyron regarding Prime resolution with Attorney General and next steps.
08/13/20	N. Koffroth	2.70	1,354.05	AGI	Draft stipulation and order resolving motion to enforce sale order re Attorney General conditions
08/13/20	K.M. Howard	0.30	75.23	AGI	Analysis of the amended tentative ruling regarding Debtors' Enforcement Motion Authorizing the Sale to Prime Healthcare to determine additional requirements and deadlines set by the court.
08/14/20	C. Montgomery	0.10	80.00	AGI	Review Attorney General order Re stipulation.
08/31/20	S. Maizel	0.10	80.00	AGI	Review and respond to emails re AG inquiry into percentage of employees hired by Prime.
<b>Subtotal</b>		<b>63.50</b>	<b>37,687.59</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	K.M. Howard	0.30	75.23	APP	Reviewed email from S. Maizel regarding Judge Robles' AG Decision (.1); reviewed and assembled AG Decision (.1); prepared email regarding same (.1).
	<b>Subtotal</b>	<b>0.30</b>	<b>75.23</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B100 - Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	S. Alberts	0.90	720.00	B100	Review materials and share thoughts with Dentons working group (.4) and confer with working group about Prime requests and Options (.5).
	<b>Subtotal</b>	<b>0.90</b>	<b>720.00</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	S. Libowsky	0.60	480.00	B110	Emails to and from Tania Moyron, Hope Levy-Biehl, retrieve materials from filed HSR submission.
08/18/20	K.M. Howard	0.60	150.45	B110	Received and reviewed transcript of August 12th hearing (.2); prepared email to Verity Team (.1); email exchanges with T. Moyron regarding changes to transcript (.1); email exchanges with M. Hiatt (.1); email exchanges with K. Persaud (.1).
	<b>Subtotal</b>	<b>1.20</b>	<b>630.45</b>		



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	R. Garms	2.70	1,629.45	B130	Review closing documents (1.3); e-mails regarding transaction (0.8); checklist call (0.2); call regarding title issues (0.4).
08/02/20	N. Koffroth	0.60	300.90	B130	Participate in internal call re Prime [REDACTED]
08/02/20	T. Moyron	3.70	2,217.23	B130	Conference call with D. Bleck re status (.1); conference call with S. Maizel, J. Richlin and G. Gertler re matters related to closing and systems (.9); conference call with P. Chadwick re same (.2); conference call with H. Levy-Biehl re closing and related matters (.3); conference call with R. Adcock, BRG, et al. (.6); conference call with J. Richlin re potential resolution of AG issues (.5); conference call with J. Richlin and D. Eldan re potential resolution of AG issues (.6); conference call with J. Richlin re AG (.3); analyze emails with Prime re call (.2).
08/02/20	S. Maizel	1.00	800.00	B130	Telephone conference with H. Kevane, H. Levy Biehl, etc. re payor contract claims.
08/02/20	S. Maizel	0.80	640.00	B130	Telephone conference with J. Richlin, etc. re closing issues.
08/02/20	S. Maizel	0.20	160.00	B130	Review and revise email re SFMC closing issues.
08/02/20	N. Carson	0.40	164.90	B130	Analyze deeds and title commitments.
08/03/20	N. Carson	0.40	164.90	B130	Analyze deeds and title commitments.
08/03/20	T. Moyron	2.30	1,378.28	B130	Analyze matters related to Prime's request and MPT (.6); correspond with H. Levy-Biehl, et al re same (.2); call with H. Levy-Biehl, et al. re same (.5); correspond with MWE and call with MWE (.4); analyze matters related to AG offer (.4); call with J. Richlin, S. Maizel and P. Chadwick (.2).
08/03/20	T. Moyron	2.40	1,438.20	B130	Call with Prime, Verity, BRG, et al re closing matters (.5); call with J. Richlin, S. Maizel and P. Chadwick (.2); analyze open issues re closing (.6); analyze D. Eldan email (.1); analyze AG proposal (.3); call with P. Chadwick re same (.2); closing checklist call with Verity, BRG, etc. (.5).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	S. Maizel	0.20	160.00	B130	Telephone conference with Joel Richlin, etc. re sale closing issues.
08/03/20	S. Maizel	0.50	400.00	B130	Telephone conference with H. Levy Biehl and T. Moyron re MPT issues (.4); telephone conference with Matt Garms, etc. re same (.1).
08/03/20	S. Maizel	0.70	560.00	B130	Telephone conference with Joel Richlin and T. Moyron re sale closing issues (.5); telephone conference with P. Chadwick, T. Moyron re same (.2).
08/03/20	S. Maizel	1.00	800.00	B130	Review CMS stipulation for filing (.7): review and respond to emails re same (.3).
08/03/20	S. Maizel	0.50	400.00	B130	Telephone conference with Prime re sale closing issues.
08/03/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, BRG, etc. re sale closing issues.
08/03/20	R. Westhoff	0.50	234.00	B130	Review issues re: changes in legal descriptions in Grant Deeds (.1); review emails from H. Levy-Biehl re: title company exception and Attorney General issues (.1); review strategy re: resolving same (.3).
08/03/20	A. Dondoyano	3.00	969.00	B130	Review MWE's drafts of various closing documents and revise the same (1.6); Internal checklist call (0.4); Revise closing checklist (1.0).
08/03/20	N. Koffroth	0.50	250.75	B130	Participate in internal call re sale closing issues.
08/04/20	G. Medina	0.70	205.28	B130	Call with the SFMC Prime closing Check list call with team.
08/04/20	A. Dondoyano	1.20	387.60	B130	Call with Dentons team and MWE re AG conditions and title issues (0.2); Closing checklist call and revise closing checklist (0.9); Confer with Dentons, client and DWT re updating the litigation disclosure schedule (0.1).
08/04/20	T. Moyron	1.90	1,138.58	B130	Conference call regarding feasibility and P. Chadwick declaration (1.0); call with G. Gertler, et al. re MPT (.1); call with P. Chadwick and R. Adcock (.3); call with H. Kevane, et al. payor matters (.3) and emails with H. Kevane, et al. re same (.2);

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	R. Westhoff	0.90	421.20	B130	Review emails between G. Fierman and S. Green re: title insurance coverage issues (.2); prepare for and participate in call with G. Fierman and G. Gertler re: resolution of same (.2); review escrow instructions to title company (.3) summarize issues re: same (.2).
08/04/20	D. Pina	0.50	159.38	B130	Communications with R. Richards and assist with executed copy of asset purchase agreement entered into with Prime Healthcare.
08/04/20	C. Montgomery	0.60	480.00	B130	Participate in conference call regarding Prime lock box accounts (.5); follow up communications with H Levy Biehl and T Moyron (.1)
08/04/20	S. Maizel	0.10	80.00	B130	Telephone conference with Prime re MPT issues.
08/04/20	S. Maizel	0.60	480.00	B130	Telephone conference with J. Richlin, etc. re sale closing issues.
08/04/20	S. Maizel	0.20	160.00	B130	Telephone conference with Prime re sale closing issues.
08/04/20	S. Maizel	0.20	160.00	B130	Telephone conference with Dan Bleck, etc. re sale closing issues.
08/05/20	J.A. Moe, II	0.10	59.93	B130	/SFMCAPA Exhibit/ In regard to closure of the sales of St. Francis (and Seton), review E-Mail from Adam Dondoyano and telephone call with Karleen Murphy on updating the Exhibit on claims and litigation asserted against St. Francis (and Seton).
08/05/20	N. Carson	0.30	123.68	B130	Analyze and revise conveyance deeds.
08/05/20	R. Westhoff	0.60	280.80	B130	Prepare for and participate in internal call re: direct deed to MPT (.5); review and respond to emails from H. Levy-Biehl and G. Gertler re: scheduling all-hands call to discuss same (.1).
08/05/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re sale issues.
08/05/20	S. Maizel	0.20	160.00	B130	Telephone conference with Prime re MPT transfer issues.
08/05/20	S. Maizel	0.50	400.00	B130	Telephone conference with Prime re closing issues.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	S. Maizel	0.60	480.00	B130	Telephone conference with J. Richlin, etc. re Prospect letter.
08/05/20	C. Montgomery	0.10	80.00	B130	Communications with T Moyron and R. Adcock regarding Prospect objection.
08/05/20	A. Dondoyano	2.60	839.80	B130	Draft various closing documents (1.0); Confer with title company and facilitate completion of outstanding items (1.1); Revise closing checklist (0.5).
08/05/20	N. Koffroth	0.10	50.15	B130	Participate in internal closing call
08/06/20	A. Dondoyano	4.10	1,324.30	B130	Confer with title company and facilitate completion of outstanding items (2.0); Draft various closing documents (1.3); Closing checklist call and revise closing checklist (0.8).
08/06/20	S. Maizel	0.60	480.00	B130	Telephone conference with Prime re closing issues.
08/06/20	S. Maizel	0.80	640.00	B130	Review and respond to emails re DSH payments vis-à-vis sale.
08/06/20	T. Moyron	0.50	299.63	B130	Closing checklist call with Prime, BRG, Verity.
08/06/20	T. Moyron	0.30	179.78	B130	Analyze E. Levey email and prepare response thereto re cold comfort level (.2); analyze related emails (.1).
08/06/20	R. Westhoff	1.10	514.80	B130	Prepare for and participate in call with G. Gertler re: issues with direct deed to MPT (.4); review email from P. Chadwick re: initial draft of settlement statement (.1); review same (.3); prepare comments to same (.1); review Asset Purchase Agreement re: cost allocations (.2).
08/06/20	K. Murphy	1.50	624.75	B130	/SFMC APA Exhibit / Telephone call with John Moe re assignment to update chart (.2); prepare updates to APA Exhibit (1.1); and telephone call with John Moe to discuss draft document and finalization (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	J.A. Moe, II	0.90	539.33	B130	/SFMC APA Exhibit/ Exchange E-Mails with Tania Moyron on updated Exhibit for Prime Healthcare (.10); exchange multiple E-Mails with Karen Chapman, Ty Conner and telephone call with Mr. Conner on three new cases (.30); review E-Mail and new List from Kathleen Conway, and forward to Karleen Murphy for updated Exhibit (.10); telephone call with Karleen Murphy on updating the Exhibit in regard to the sale of St. Francis (.20); telephone call with Karleen Murphy reviewing updated Exhibit, identifying revisions and additions (.20).
08/06/20	S. Maizel	0.40	320.00	B130	Telephone conference with Gary Gertler, etc. re closing issues.
08/06/20	S. Maizel	0.30	240.00	B130	Review and respond to emails re DSH payments.
08/06/20	S. Maizel	0.20	160.00	B130	Review and respond to emails re DOJ Cold comfort letters (.1); telephone conference with T. Moyron re same (.1).
08/07/20	A. Dondoyano	2.80	904.40	B130	Confer with title company and facilitate completion of outstanding items (2.0); Closing checklist call and revise closing checklist (0.8).
08/07/20	S. Maizel	0.60	480.00	B130	Telephone conference with G. Gertler, etc re closing issues.
08/07/20	S. Maizel	0.10	80.00	B130	Telephone conference with T. Moyron re sale closing issues.
08/07/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, etc. re MPT issues.
08/07/20	S. Maizel	0.40	320.00	B130	Telephone conference with G. Gertler, etc. re MPT issues.
08/07/20	S. Maizel	0.10	80.00	B130	Telephone conference with G. Gertler re closing issues.
08/07/20	S. Maizel	0.10	80.00	B130	Telephone conference with T. Moyron re closing issues.
08/07/20	S. Maizel	0.30	240.00	B130	Telephone conference with R. Adcock, BRG, etc. re MPT issues.
08/07/20	R. Millner	0.20	160.00	B130	Emails R. Richards re St. Francis APA revisions.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	C. Montgomery	0.70	560.00	B130	Communications with A Dondoyano and T Moyron regarding Prime assignment agreement language and APA (.3); communications with H Levy-Biehl regarding IMA language (.1); participate in phone conference regarding Prime MPT issues (.3)
08/07/20	T. Moyron	0.80	479.40	B130	Conference call with H. Kevane, BRG, et al.
08/07/20	N. Carson	0.50	206.13	B130	Analyze deeds and conference with A. Dondoyano re same.
08/07/20	S. Martin	0.20	152.15	B130	Review order regarding Prospect objection.
08/08/20	T. Moyron	1.20	719.10	B130	Analyze matters related to St. Francis sale, including TSA, CMS, etc (.8); and correspond re same (.4).
08/08/20	R. Westhoff	0.30	140.40	B130	Review draft closing statement (.2); review emails from J. Schlant and J. Richlin re: same (.1).
08/08/20	A. Dondoyano	0.20	64.60	B130	Revise various closing documents.
08/09/20	C. Montgomery	0.40	320.00	B130	Review order and memorandum striking Prospect pleading (.3); communications with M Garms regarding TSA (.1)
08/09/20	T. Moyron	0.20	119.85	B130	Analyze email from MWE re closing documents (.1); analyze email from P. Chadwick re TSA (.1).
08/10/20	T. Moyron	1.30	779.03	B130	Analyze emails from J. Richlin, et al., re additional items needed re labor matters (.3); correspond with R. Adcock, et al., re timing of close and WARN (.2); correspond with MWE re IMA and sale leaseback (.1); analyze additional MWE, et al., emails re closing documents and changes (.4); analyze matters related to TSA and other documents (.3).
08/10/20	T. Moyron	0.60	359.55	B130	Conference call with Prime, BRG, H. Levy-Biehl, et al. re closing checklist.
08/10/20	A. Dondoyano	6.10	1,970.30	B130	Closing checklist call and revise closing checklist (1.1); Draft various closing documents and confer with title company re outstanding items (5.0).
08/10/20	S. Maizel	0.10	80.00	B130	Telephone conference with G. Gertler re CMS issues vis-à-vis DSH payments.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	S. Maizel	0.50	400.00	B130	Telephone conference with Prime re closing checklist issues.
08/10/20	T. Moyron	0.40	239.70	B130	Analyze MWE, et al., correspondence regarding equipment leases and other closing matters (.3); prepare email re same (.1).
08/10/20	T. Moyron	0.30	179.78	B130	Analyze proposed language to IMA (.2); analyze MWE email re signatures (.1).
08/10/20	C. Montgomery	1.40	1,120.00	B130	Review Prime TSA and exhibits (.2); review Huntington lease correspondence regarding equipment used at SFMC and communications with J Emerson re same (.3); propose revision to Prime IMA (.9)
08/10/20	C. Montgomery	2.20	1,760.00	B130	Review IMA and participate in Phone conference with M Garms re same (1.5); phone conference with J Emerson re UCC's(.4);communications with C Olsen re UCC list (.3).
08/10/20	N. Carson	0.50	206.13	B130	Analyze and correspond re grant deeds.
08/10/20	R. Garms	5.10	3,077.85	B130	Review and revise transition services agreement (0.8); review and revise closing documents (2.4); e-mails and calls regarding transaction (1.9).
08/11/20	R. Garms	5.60	3,379.60	B130	Review and revise closing documents (2.2); work on transition services agreement (1.3); calls and e-mails regarding transaction closing (2.1).
08/11/20	R. Garms	1.50	905.25	B130	Review purchase agreement and summarize e-mail issues.
08/11/20	N. Carson	0.30	123.68	B130	Analyze pro formas and exception schedule.
08/11/20	N. Carson	0.30	123.68	B130	Draft 1099 forms for deed properties.
08/11/20	A. Dondoyano	5.30	1,711.90	B130	Draft various closing documents and confer with title company re closing items.
08/11/20	C. Montgomery	4.00	3,200.00	B130	Review Prime ; propose revision to Prime IMA and Lease back agreements drafts circulated overnight (1.4); communications with Conner regarding release of control agreements (.1); participate in Cain call re closings (.2);review update leaseback and IMA and communications with T Moyron re

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					same (.1); phone call with T Conner regarding sweep issue (.1); participate in closing review (.4); communications regarding Prime acquisition of NantWorks equipment (1.0) participate in phone conference with T Moyron, Hope Levy Biehl, P Chadwick and R Adcock re same (.3); communications with H Levy Biehl regarding updated IMA and TSA (.4)
08/11/20	J. DiChiara	2.50	1,073.13	B130	Compile signature pages and update closing checklist; confer with A. Dondoyano regarding the same.
08/11/20	R. Westhoff	0.70	327.60	B130	Review issues re: closing instruction letter (.2); review draft of same (.2); review status of closing documents (.2); review timing for closing (.1).
08/11/20	S. Maizel	0.20	160.00	B130	Telephone conference with Prime re sale closing issues.
08/11/20	T. Moyron	2.30	1,378.28	B130	Analyze email from J. Richlin re Nant equipment (.2); analyze related matters re master equipment lease and APA (.4); conference calls with P. Chadwick re same (.2); analyze J. Richlin, et al. emails re migration of emails (.3); analyze W-4 inquiries and analysis (.4); analyze WARN matters (.4); conference call with P. Chadwick, R. Adcock, C. Montgomery, et al. re Nant equipment (.4).
08/11/20	T. Moyron	1.60	958.80	B130	Analyze updated IMA and Sale Leaseback and redlines (.7); calls with R. Adcock and P. Chadwick regarding RO (.4); calls regarding same (.2); analyze MWE, et al., emails and attached documents re IMA/Sale Leaseback (.3).
08/11/20	M.M. Welch	1.40	374.85	B130	Read email from Peter Chadwick from Berkeley Research Group regarding SFMC Prime Closing Checklist Call (.10); review SFMC equipment list (:30); SFMC Prime Closing Checklist call (1:00).



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	C. Montgomery	0.90	720.00	B130	Review latest draft IMA (.4) communications with A Dondonyo re same (.1); review buyer proposed property allocations and communications with M Garms re same (.1) ; review closing statement draft (.1) ;communications with T Moyron regarding Tenant Lease rejection stipulation (.2)
08/12/20	J.A. Moe, II	0.70	419.48	B130	In regard to the sale of St. Francis: Telephone call from Karen Chapman on request for the APA (.10); identify APA and transmit to Ms. Chapman (.30); review the APA and the TSA and identify for and confer with Ms. Chapman on the requirement of cooperation from AHMC (.30).
08/12/20	M.M. Welch	0.50	133.88	B130	Closing Checklist call.
08/12/20	N. Carson	0.50	206.13	B130	Analyze and revise lien indemnity
08/12/20	C. Montgomery	0.40	320.00	B130	Communications with A. Dondoyano re Prime closing deliverables (.2); review latest draft IMA(.2).
08/12/20	J. DiChiara	2.40	1,030.20	B130	Compile documents for closing (1.9); confer with A. Dondoyano regarding the same (.5).
08/12/20	J. Whipple	0.40	210.80	B130	Correspondence regarding Prime sale order.
08/12/20	R. Westhoff	0.80	374.40	B130	Handle closing issues (.2); review issues re: recording fees (.2); review draft closing documents (.2); review email from J. Schlant re: revised closing statement (.1); review same (.1).
08/12/20	A. Dondoyano	7.40	2,390.20	B130	Draft various closing documents and confer with title company re closing items to facilitate closing.
08/12/20	T. Moyron	1.30	779.03	B130	Analyze and prepare order and analyze related matters and correspondence.
08/12/20	R. Garms	4.90	2,957.15	B130	Revise Transition Services Agreement (2.5); e-mails and calls regarding closing (1.1); work on closing documents (1.3).
08/13/20	R. Garms	5.80	3,500.30	B130	E-mails and calls regarding closing (2.3); work on closing documents (3.5).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	A. Dondoyano	5.80	1,873.40	B130	Draft various closing documents and confer with title company re closing items to facilitate closing.
08/13/20	R. Richards	0.20	144.60	B130	Review draft notice letter.
08/13/20	T. Moyron	9.30	5,573.03	B130	Internal closing checklist call re sale (.3); closing call with Prime, BRG, etc. (.3); follow up closing call with Prime (.4); conference call with MPT's counsel re title (.3); call to J. Richlin re closing statement (.1); calls with Chicago Title (.3); analyze MWE emails re closing (.6); analyze various closing documents and closing matters, including TSA documents and exhibits (3.6); analyze TSA and updated TSA and exhibits (.4); exchange emails with Chicago Title (.4); analyze emails from G. Gertler, et al. re EBITDA (.4); conference calls with P. Ricotta re same (.2); correspond with P. Chadwick, et al. (.3); analyze closing statements and updated closing statements (.6); analyze HL request and agreement (.4); [REDACTED]; conference calls with P. Chadwick re same (.4).
08/13/20	N. Carson	0.40	164.90	B130	Analyze deed and conference with L. Kmiec and A. Dondoyano re same.
08/13/20	M. Zeefe	1.60	768.40	B130	Draft notice of SFMC sale closing (1.5); emails with H. Kevane and T. Moyron re same (0.1).
08/13/20	C. Montgomery	0.50	400.00	B130	Review latest draft TSA and communications with T Moyron and M Garms re same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	R. Westhoff	2.20	1,029.60	B130	Review issues re: legal descriptions in Grant Deeds (.3); review email from L. Kmiec re: transfer tax exemptions (.1); review issues re: same (.3); review email from C. Olson re: status of closing statement (.1); review email from J. Schlant re: same (.1); review emails from G. Gertler re: same (.1); review email from P. Chadwick re: same (.1); review issues re: EBITDA purchase price reduction (.2); review emails from G. Gertler and J. Richlin re: same (.2); review emails from J. Schlant re: revised closing statement (.1); review same (.3); review emails from B. Lewis, C. Olson and J. Schlant re: execution of same (.1); review closing authorization emails (.1); review emails from B. Lewis re: closing and disbursement confirmations (.1).
08/13/20	J. DiChiara	0.90	386.33	B130	Review signature pages for closing (.2); review and revise closing checklist (.7).
08/13/20	S. Maizel	1.20	960.00	B130	Multiple telephone conferences with Prime, et. al. re closing issues (.8); telephone conference with MPT counsel re Prime closing issues (.4).
08/14/20	A. Dondoyano	0.90	290.70	B130	Finalize and compile closing documents.
08/14/20	J.A. Moe, II	0.10	59.93	B130	Review Notice Of Closing Date On Sale Of St Francis Medical Center; review Notice Of Closing Date On Sale Of Seton Medical Center.
08/14/20	R. Garms	1.10	663.85	B130	E-mails regarding closing.
08/17/20	J. DiChiara	2.60	1,116.05	B130	Create Closing Binder Index and Closing Binder.
08/17/20	A. Dondoyano	0.80	258.40	B130	Finalize and compile closing documents.
08/19/20	T. Moyron	1.00	599.25	B130	Analyze J. Richlin, et al. emails re employee matters, etc. (.2); conference call with H. Levy-Biehl re employee matters (.2); analyze T. Conner, et al., emails re accounts (.2); analyze emails from Prime re same (.2); analyze IMA related issues (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	T. Moyron	1.30	779.03	B130	Conference call with BRG, H. Levy-Biehl, et al. re sweeps (.5); analyze Prime, et al., emails and wire confirmations (.3); analyze employee related inquiries and issues re Prime requests (.2); analyze H. Levy-Biehl, et al. correspondence (.3).
08/20/20	R. Garms	1.70	1,025.95	B130	E-mail regarding acquired / excluded assets (0.9); review purchase agreement regarding same (0.5); call regarding purchase agreement questions (0.3).
08/20/20	T. Moyron	0.20	119.85	B130	Analyze E. Goldstein, et al., emails re United the pro-rata portion of the August capitation payment.
08/20/20	C. Montgomery	1.20	960.00	B130	Participate in conference call with P Chadwick, T Conner, R Adcock, T Moyron, M Garms regarding account management post closing (.5) ; follow up communications with H Levy Beihl and T Moyron (.1) ; confernce Call regarding Prime APA and IMA with M Garms , H Levy Beihl, P Chadwick, R Adcock (.5) ; communications with P Chadwick re capitation payments (.1)
08/21/20	C. Montgomery	0.50	400.00	B130	Phone conference re capitation payments(.3) ; communications with T Conner, T Moyron, P Chadwick re same (.2)
08/21/20	S. Maizel	0.30	240.00	B130	Telephone conference with BRG, etc. re SFMC capitation payments.
08/21/20	T. Moyron	1.00	599.25	B130	Conference call with R. Adcock, BRG, et al. re St. Francis capitation (.3); analyze emails from T. Conner, et al. re same (.3); analyze J. Richlin email re employee files (.1); analyze matters related to employee matters and capitation issues under APA (.3).
08/21/20	R. Garms	3.20	1,931.20	B130	Review purchase agreement regarding transaction issues (1.2); call regarding same (0.5); draft and revise e-mail responses on issues (1.5).
08/27/20	K.M. Howard	0.60	150.45	B130	Analysis of Verity Effective Date Obligations and reviewed and revised Critical Dates Memorandum.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	T. Moyron	0.40	239.70	B130	Analyze H. Levy-Biehl, et al., correspondence re Prime.
08/28/20	R. Garms	1.90	1,146.65	B130	Review purchase agreement provisions and respond to transaction issues (1.3); review and respond to transition services agreement questions (0.6).
08/31/20	R. Garms	0.70	422.45	B130	E-mails regarding lien issues.
09/01/20	R. Garms	0.50	301.75	B130	Call regarding employee issues (0.3); review transaction documents in preparation for call (0.2).
09/03/20	N. Carson	3.10	1,277.98	B130	Analyze and revise deeds of trust, UCC terminations and related documents and conference with counsel re same.
09/04/20	N. Carson	0.50	206.13	B130	Finalize deed of trust release documents.
	<b>Subtotal</b>	<b>169.90</b>	<b>90,902.14</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B140 - Relief from Stay/Adequate Protection Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K. Murphy	4.60	1,915.90	B140	/Nguyen, Natalie / Confer with John Moe re preparation of KFM Declaration re Small Claims Court case for supplemental objection to Motion for Relief From Automatic Stay (.1); prepare draft declaration with Exhibits A-J and prepare exhibits (4.3); and confer with Elina Tilman by phone and email re facts of the court's initial dismissal of matter (.2).
08/03/20	K.M. Howard	0.40	100.30	B140	Analysis of J. Robles' Order regarding Plaintiff's Motion for Relief from Stay filed in Natalie Nguyen v. St. Francis Medical Center and reviewed and revised Critical Dates Memorandum.
08/03/20	J.A. Moe, II	0.50	299.63	B140	/Natalie Nguyen v. St. Francis/ Review Order from Judge Robles on Motion For Relief From Automatic Stay and two telephone conferences with Karleen Murphy reviewing background facts and creating Declaration for August 10th hearing (.30); third telephone call with Karleen Murphy on contents of the Declaration and reference to Exhibits (.10); E-Mail and telephone call from Elina Tilman on Declaration in further support of the Opposition to Ms. Nguyen's continued hearing on Motion (.10).
08/04/20	K. Murphy	0.70	291.55	B140	/Nguyen, Natalie / Draft email to John Moe re KFM draft Declaration re Small Claims Court case for supplemental objection to Motion for Relief From Automatic Stay (.1); confer with John Moe by phone re the same (.1); and prepare further edits to draft to finalize declaration (.5).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	J.A. Moe, II	0.40	239.70	B140	/Natalie Nguyen v. St. Francis/ Two telephone calls with Karleen Murphy on creating and contents of the Debtors' Supplemental Memorandum in regard to the Motion For Relief From Stay (.20); prepare first rough draft of Supplemental Memorandum in support of the Court's Tentative Ruling Setting October 1, 2020 As Date For Relief From The Automatic Stay (.20).
08/05/20	J.A. Moe, II	0.20	119.85	B140	/Natalie Nguyen v. St. Francis/ Revise first draft of the Supplemental Memorandum in response to the Court Order on Motion For Relief From Stay.
08/06/20	J.A. Moe, II	0.10	59.93	B140	/Eduardo Vasquez v. St. Francis/ Review relief from stay and Withdrawal of Claim, and E-Mail to Karleen Murphy on relief from stay Chart.
08/06/20	J.A. Moe, II	2.80	1,677.90	B140	/Natalie Nguyen v. St. Francis/ Revise second draft of the Supplemental Memorandum on Motion For Relief From Stay (.20); assemble and review the previously filed pleadings (and draft pleading for the Superior Court), then prepare revised and expanded Supplemental Memorandum and exchange E-Mails on and assemble Exhibits to the Declaration of Karleen Murphy (.80); revise and expand -- through three iterations -- the Supplemental Memorandum (1.40 ); review Court's Order and include as a Footnote (.20) review Natalie Nguyen's August 6th Response and two telephone calls with Elina Tilman on Response and conference call (.20).
08/06/20	K. Murphy	0.10	41.65	B140	/ Nguyen / Analyze Supplemental Response to Opposition to Plaintiff's Motion For Relief From Automatic Stay.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	J.A. Moe, II	0.60	359.55	B140	/Natalie Nguyen v. St. Francis/ Telephone calls to Judge's Chambers, and confer with Court Clerk on resolution of the Case (.30); attend bankruptcy court hearing via Court Call, and appear at hearing and announce settlement of the Motion For Relief From Stay (and Litigation and Claims) (.20); exchange E-Mails with Elina Tilman on payment (.10).
08/13/20	J.A. Moe, II	0.10	59.93	B140	/Natalie Nguyen v. St. Francis/ Review status on resolution of Motion For Relief From Stay, the Withdrawal of multiple Claims, and payment to Ms. Nguyen.
08/17/20	J.A. Moe, II	0.50	299.63	B140	/Natalie Nguyen v. St. Francis/ Review Andres Estrada's E-Mail on Claim Numbers, for Withdrawal Of Claims, and consider Withdrawal Of Motion For Relief From Stay (.10); prepare draft of the Withdrawal Of Seven Claims (.30); prepare draft of the Withdrawal Of Motion For Relief From Stay (.10).
<b>Subtotal</b>		<b>11.00</b>	<b>5,465.52</b>		



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	R. Richards	0.30	216.90	B185	Review list of contracts to be rejected and email with John Emerson re same.
08/05/20	R. Richards	0.70	506.10	B185	Call with Henry Kevane re payor agreements (0.2); work on motion to reject payor agreements (0.5).
08/05/20	K.M. Howard	0.20	50.15	B185	Analysis of the ruling approving the compromise between Debtors and NantWorks to ascertain related deadlines.
08/06/20	R. Richards	1.20	867.60	B185	Prepare Seventh Omnibus Motion to reject Payor agreements (0.9); review comments and emails re same (0.3).
08/07/20	T. Moyron	1.30	779.03	B185	Analyze objection re payor agreements (.4); correspond with H. Kevane, et al. (.3); analyze matters related to rejection timing and sale and plan (.6).
08/07/20	R. Richards	1.60	1,156.80	B185	Review prior pleadings re SFMC payor agreements (0.6); revise Seventh Omnibus Motion to Reject SFMC Payor Agreements and Adcock Declaration (0.7); emails re same and basis for emergency relief (0.2); call with Jon Emerson of BRG re payor agreements for the exhibit (0.1).
08/07/20	J.A. Moe, II	0.40	239.70	B185	/Beckman Coulter/ Telephone call returned from Lara Martin on return of equipment prior to sale (.20); review Lara Martin's E-Mail and E-Mail to Peter Chadwick on return of equipment to Beckman Coulter (.20).
08/08/20	R. Richards	1.10	795.30	B185	Review comments and email on Seventh Omnibus motion to reject (0.3); assist on revising motion to reject (0.7); call with Jon Emerson of BRG on equipment leases (0.1).
08/08/20	N. Koffroth	4.20	2,106.30	B185	Draft emergency omnibus motion to reject certain agreements
08/09/20	N. Koffroth	2.40	1,203.60	B185	Draft emergency omnibus motion to reject certain agreements

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/09/20	R. Richards	1.30	939.90	B185	Review comments on motion to reject (0.3); review monthly run rate calculations (0.2); revise and circulate emergency motion, memorandum of law and Adcock Declaration (0.8).
08/09/20	T. Moyron	2.80	1,677.90	B185	Analyze, prepare and finalize emergency motion and seventh omnibus objection and declaration (1.7); conference call with H. Kevane regarding same (.2); analyze J. Schlant, et al., emails re amounts for motion (.3); analyze J. Emerson, et al., emails re exhibits (.2); correspond with H. Kevane, et al. re filing of emergency motion (.4).
08/09/20	S. Maizel	0.40	320.00	B185	Review and revise 7th motion to reject contracts.
08/10/20	G. Medina	0.20	58.65	B185	Communication with H. Kevane regarding Emergency motion and Seventh Omnibus Motion To Reject.
08/10/20	R. Richards	1.00	723.00	B185	Call with T. Moyron re open issues (0.2), follow up on executory contract issues (0.3), work on Eighth Omnibus Rejection motion (0.3), discuss exhibit of contracts with Jon Emerson re BRG (0.2).
08/10/20	K.M. Howard	0.10	25.08	B185	Analysis of order approving stipulation between St. Francis and Omnicare Medical for rejection of risk-sharing agreement to determine additional requirements set by the court.
08/11/20	T. Moyron	0.50	299.63	B185	Conference call with H. Kevane, et al. re motion to reject re payors.
08/11/20	K.M. Howard	0.40	100.30	B185	Analysis of Tentative Ruling regarding Debtors' Seventh Omnibus Motion to Reject Certain Payor, Administrative and Risk-Sharing Agreements and reviewed and revised Critical Dates Memorandum.
08/11/20	N. Koffroth	1.20	601.80	B185	Draft supplement to seventh omnibus rejection motion
08/12/20	T. Moyron	0.40	239.70	B185	Analyze order and comments re seventh omnibus objection (.2); exchange emails with H. Kevane, et al. re same (.2).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	J.A. Moe, II	0.30	179.78	B185	/Beckman Coulter/ Exchange E-Mails with Lara Martin on pick up of equipment, then exchange E-Mails with Peter Chadwick and Margaret Pfeiffer on pick up of equipment (.20); E-Mail and telephone call to Lara Martin discussing pick up of Beckman Coulter equipment (.10).
08/13/20	C. Montgomery	1.10	880.00	B185	Phone conference with N Koffroth, H Kevane, and J Emerson regarding Premier contract issues and rejection versus termination (.5); follow up phone calls with K Koffroth and J Emerson re same (.2); communications with M Zeefe regarding notice to PRHE regarding withdrawal and trust rejection (.4)
08/13/20	K.M. Howard	0.20	50.15	B185	Analysis of Supplement to Debtors' Emergency Motion and Seventh Omnibus Motion to Reject Certain Payor, Administrative and Risk-Sharing Agreements to determine additional requirements and deadlines.
08/13/20	K.M. Howard	0.20	50.15	B185	Analysis of tentative ruling pertaining Debtors' Motion to Reject Risk-Sharing Agreement with Healthcare LA to determine deadlines and additional requirements.
08/13/20	K.M. Howard	0.20	50.15	B185	Analysis of amended tentative ruling regarding Debtors' Emergency Motion and Seventh Omnibus Motion to Reject Certain Contracts and Leases and cross-referenced to Critical Dates Memorandum.
08/14/20	R. Richards	0.90	650.70	B185	Revise and circulate draft of Eighth Omnibus Motion to Reject (0.3); follow up call and email with Jon Emerson of BRG re same (0.2); further revise and circulate Eighth Omnibus Motion to Reject (0.4).
08/17/20	C. Montgomery	1.10	880.00	B185	Phone calls and communications with N Koffroth regarding rejection of Premier Agreements and Confirmation Order (.4+...)
08/17/20	R. Richards	1.00	723.00	B185	Call with Jon Emerson of BRG on contracts to be rejected (0.2); work on next omnibus rejection motion (0.8).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/20	C. Montgomery	0.80	640.00	B185	Phone calls with N Koffroth and F Neufeld regarding Premier rejection question (.3); phone calls with J Emerson re same (1); review data transfer agreement ( SPMC) and Premier Subscription Agreement (.4)
08/21/20	R. Richards	1.20	867.60	B185	Review and forward records retention related pleadings and orders (0.5); call re same with new Liquidating Trustee (0.4); revise and circulate Eighth Omnibus Motion to Reject (0.3).
08/24/20	R. Richards	0.30	216.90	B185	Work on finalizing Eighth Omnibus Motion to Reject.
09/02/20	R. Richards	1.40	1,012.20	B185	Prepare Ninth Omnibus motion to reject (0.7); review schedule of contracts to be rejected in Ninth Omnibus and comment on schedule (0.3); revise and circulate Ninth Omnibus to BRG and Pachulski (0.4).
09/03/20	R. Richards	1.50	1,084.50	B185	Review comments on Ninth Omnibus motion to reject (0.2), revise and circulate same (0.3), calls and emails with BRG re exhibits to motion (0.3), prepare Tenth Omnibus motion to reject (0.4), review final assembled versions of rejection motions (0.2), emails re winddown record keeping (0.1).
<b>Subtotal</b>		<b>31.90</b>	<b>20,192.57</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/20	K. Murphy	0.40	166.60	B190	/ Cortes / Prepare for drafting Status Conference Statement re Bankruptcy by analyzing Superior Court Website to confirm upcoming Status Conference date and date of filing Notice of Automatic Stay (.1); analyze prior conference report (.1); and draft status conference statement (.2).
08/02/20	J.A. Moe, II	0.10	59.93	B190	/Jessica Moritaya v. St. Francis/ Review notice of upcoming Case Management Conference and E-Mail to Karleen Murphy on Mike Gonzalez' appearance.
08/03/20	K. Murphy	0.20	83.30	B190	/ Sorto / Analyze and respond to request from John Moe for SFMC's Answer (.1); and research LA Superior Court Website to download Answer and email to John Moe. (.1).
08/03/20	K. Murphy	0.10	41.65	B190	/ Fuentes / Prepare update to Verity Litigation Chart to reflect defense litigation counsel assignment to matter with relief from automatic stay.
08/03/20	J.A. Moe, II	0.50	299.63	B190	/Maria Padilla v. St. Francis/ Review letter from Attorney Farid Yaghoubtil on notification of Claim, exchanging E-Mails with Karen Chapman on letter on stay (.10); E-Mail to Andres Estrada on Notices served upon Maria Padilla (.10); prepare draft of letter to Farid Yaghoubtil on automatic stay (.20); review and correct letter to Mr. Yaghoubtil (.10).
08/03/20	J.A. Moe, II	0.10	59.93	B190	/Edgar Monaco v. St. Francis/ Review multiple E-Mails on Subpoena served upon St. Francis, and "meet and confer" on Subpoena; E-Mail to Elina Tilman on "meet and confer" on Subpoena.
08/03/20	J.A. Moe, II	0.10	59.93	B190	/Iris Hernandez v. St. Francis/ Review notice of upcoming Case Management Conference, including a hearing on dismissal and sanctions, and E-Mail to Karleen Murphy on hearing.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	K. Murphy	0.20	83.30	B190	/ Vazquez / Analyze Order on Relief From Automatic Stay and prepare updates to Verity Charts re the same (.1); and draft email to Karen Chapman seeking identification of litigation counsel (.1).
08/04/20	K. Murphy	0.10	41.65	B190	/ Durham / Confer with John Moe re attending upcoming status conference.
08/04/20	K. Murphy	0.10	41.65	B190	/ Morataya / Confer with John Moe re attending upcoming status conference and draft email to John Moe enclosing Status Conference Statement.
08/04/20	J.A. Moe, II	0.10	59.93	B190	/Maria Padilla v. St. Francis/ Review and make two minor edits to the letter to Ms. Padilla's counsel on imposition of the automatic stay.
08/04/20	J.A. Moe, II	0.10	59.93	B190	/Sinthia Cortes v. St. Francis/ Review exchange of E-Mails with Craig Donahue on relief form stay as to Ms. Cortes.
08/05/20	K. Murphy	1.00	416.50	B190	/ Aragon / Prepare for attending Status Conference re Bankruptcy by analyzing statement and prior conference report (.1); attend conference (.8); and prepare report to Verity Team and update Verity Chart with newly set conference date (.1).
08/05/20	K. Murphy	0.10	41.65	B190	/ Durham / Analyze John Moe's report of Status Conference and prepare update to Verity Chart re same.
08/05/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze John Moe's report of Status Conference and prepare update to Verity Chart re same.
08/05/20	K. Murphy	2.70	1,124.55	B190	/ Natalie Nguyen/ Prepare initial draft of Statement re Non-Appearance Case Review with detailed report of the status of the Bankruptcy Court's orders re Plaintiff's Motion for Relief From Automatic Stay and assemble exhibits A-E (2.0); confer with John Moe and Elina Tilman re draft (.3); prepare revisions to draft and finalize (.3); and draft email to Karen Chapman for signature and review of the same (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	K. Murphy	0.10	41.65	B190	/Harris/ Analyze and respond to email from Elina Tilman re upcoming post mediation status conference and notice of settlement to court.
08/05/20	K. Murphy	0.20	83.30	B190	/Morataya/ Telephone call with John Moe re case settlement evaluation (.1); and draft email to Karen Chapman re insurance coverage and analyze response (.1).
08/05/20	J.A. Moe, II	0.30	179.78	B190	/Breta Durham v. St. Francis/ Appear via Court Call on Case Management Conference, reporting on the status of St. Francis Medical Center in regard to the bankruptcy case, and the continuation of the Conference to January 13, 2021 (.20); prepare Report on results of the hearing (.10).
08/05/20	J.A. Moe, II	1.30	779.03	B190	/Jessica Moritaya v. St. Francis/ Prepare for and attend Case Management Conference, reporting on the bankruptcy case, CMC continued to December 10th (.70); prepare Report on the CMC hearing (.10); confer with John Emerson and John Schlant on value of Administrative Claim (.10); telephone call and E-Mail to, and discussion with Mr. Gonzalez on previous exposure analysis (.20); telephone call with John Schlant on amount of claim and setting reserve (.20).
08/05/20	J.A. Moe, II	0.30	179.78	B190	/Natalie Nguyen v. St. Francis/ Review proposed Case Management Conference Statement and Declaration to be filed in the Small Claims Court Case (.10); telephone call with Karleen Murphy on filing pleading in the Small Claims Court Case (.10); review revised CMC Statement without Declaration (.10).
08/06/20	J.A. Moe, II	0.20	119.85	B190	/Maria Padilla v. St. Francis/ Review letter on imposition of the automatic stay, and request addition of two of four Exhibits (.1); review letter with expanded Exhibits (.1).
08/06/20	J.A. Moe, II	0.10	59.93	B190	/Esmeralda Garcia v. St Francis/ Review proposed Case Management Conference Statement, and E-Mail to Karleen Murphy on filing the Statement.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	J.A. Moe, II	0.20	119.85	B190	/Scarlett Teas v. St Francis/ Prepare first draft of letter to Counsel on imposition of the automatic stay.
08/06/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyzed notice of continued status conference.
08/06/20	K. Murphy	0.10	41.65	B190	/ Nguyen / Analyzed email from Karen Chapman enclosing signature page for Statement re Non-Appearance Case Review.
08/07/20	K. Murphy	0.60	249.90	B190	/ Natalie Nguyen / Analyze plaintiff's settlement offer (.1); and telephone call with An Ruda, Elina Tilman, and John Moe to discuss response to the same (.5).
08/07/20	K. Murphy	0.10	41.65	B190	/Rubio/ Analyze email from Karen Chapman enclosing confirmed Request for Dismissal and analyze dismissal.
08/07/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze email from Karen Chapman with case update re recent deposition and trial status.
08/07/20	K. Murphy	0.40	166.60	B190	/ Vazquez / Confer with Craig Donahue (litigation counsel) by email re relief from automatic stay (.1); and telephone call with John Moe and Craig Donahue re the same (.3).
08/07/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen / Analyze emails from Richard Adcock, An Ruda, John Moe and Plaintiff re case settlement offers.
08/07/20	J.A. Moe, II	0.10	59.93	B190	/Alicia Rubio v. St. Francis/ Review Karen Chapman's E-Mail on settlement of Case, and E-Mail to Karleen Murphy on resolution of case.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	J.A. Moe, II	1.60	958.80	B190	/Natalie Nguyen v. St. Francis/ Conference call with An Ruda, Elina Tilman and Karleen Murphy, on status of and settlement offer from Natalie Nguyen, reviewing previous payments to Ms. Nguyen and potential waiting time penalty, and reviewing parameters of settlement offer (.40); review Rich Adcock's authority to proceed, then confer with Karleen Murphy, then telephone call and exchange of E-Mails with Natalie Nguyen on settlement, reviewing letter again, making two successive settlement offers (. 40); E-Mail to counsel on status of settlement (.20); prepare for hearing on August 10th (.20); exchange additional E-Mails with Natalie Nguyen (.10); telephone calls to and exchange E-Mails with An Ruda on possible settlement (.10); telephone call with An Ruda on settlement, then prepare E-Mails to Natalie Nguyen on settlement (.20).
08/07/20	J.A. Moe, II	0.30	179.78	B190	/Scarlett Teas v. St. Francis/ Review draft letter to Vadim Yeremenko, then exchange E-Mails with Andres Estrada on whether Ms. Teas received Notices and filed a Claim (.20); revise letter to select status of Notices sent to Ms. Teas (.10).
08/07/20	J.A. Moe, II	0.10	59.93	B190	/Eduardo Vasquez v. St. Francis/ Telephone call with Karleen Murphy on relief from stay to proceed with case as to insurance only.
08/07/20	J.A. Moe, II	0.20	119.85	B190	/Richard Navarro v. St. Francis/ Telephone call with Karleen Murphy on status of case, no relief from stay having been entered, and appearances in the Superior Court Case.
08/07/20	K. Murphy	0.10	41.65	B190	/ CT Corp - Porter / Analyze CT Corp notice of subpoena and email from Elina Tilman to Verity Team enclosing the same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/09/20	J.A. Moe, II	2.00	1,198.50	B190	/Natalie Nguyen v. St. Francis/ Review Settlement Agreement and search records for Claim Numbers (.30); E-Mail to Andres Estrada on Claim Numbers (.10); additional research on, locate and send Claim Numbers to Ms. Tilman with proposed addition to the Agreement (.30); exchange E-Mails with Natalie Nguyen and telephone call to Ms. Tilman on Claim Numbers (.10); review and revise with Elina Tilman the Settlement Agreement (.60); with Elina Tilman prepare E-Mail to Natalie Nguyen (.20); await return of and review signed Agreement and E-Mail to Rich Adcock the Agreement for signature, obtaining return (.40).
08/10/20	J.A. Moe, II	0.10	59.93	B190	/David Pullman v. St. Francis/ Review and exchange E-Mails with Karen Chapman, and review report from the Superior Court counsel on representation.
08/10/20	J.A. Moe, II	0.20	119.85	B190	/Priscilla Chukwumezie v. St. Francis/ Review latest notice on new EPL Claim (.10); E-Mail to Elina Tilman on notice of Bar Date (.10).
08/10/20	J.A. Moe, II	0.20	119.85	B190	/Scarlet Teas v. St. Francis/ Review and make two revisions to the letter addressed to Attorney Vadim Yeremenko, on imposition of the automatic stay, then review revised letter with attachments.
08/10/20	J.A. Moe, II	0.10	59.93	B190	/Sydney Thomson v. St. Francis/ Review and exchange E-Mails with Kathleen Thomson and Karen Chapman on insurance information sent to counsel.
08/10/20	K.M. Howard	0.40	100.30	B190	Analysis of materials regarding Maria Padilla v. St. Francis Medical Center and reviewed and revised Litigation Management Chart.
08/10/20	K.M. Howard	0.40	100.30	B190	Analysis of materials regarding Anna Teas Aldana v. St. Francis Medical Center and reviewed and revised Litigation Management Chart.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	J.A. Moe, II	0.20	119.85	B190	/Leonard Harris v. St. Francis/ Review exchange of E-Mails on payment to Leonard Harris, and telephone call with Elina Tilman on payment being sent to Mr. Harris' counsel.
08/11/20	J.A. Moe, II	0.70	419.48	B190	/Christina Makem v. St. Francis/ Review and confer with Elina Tilman on proposed letter to the Department of Fair Housing & Employment, revising section of the letter on administrative claims bar date (.20); telephone calls with Elina Tilman and internally, on identifying attachments to Ms.Tilman's letter (.20); review four documents and confer with Elina Tilman on the Voluntary Petition (.10); telephone call with Ms.Tilman reviewing Exhibits to the letter Ms. Tilman is preparing to the Department (.20).
08/11/20	J.A. Moe, II	0.40	239.70	B190	/Natalie Nguyen v. St. Francis/ Confer with Elina Tilman on proposed payment to Ms. Nguyen (.10); exchange E-Mails with the Natalie Nguyen on preparing two dismissals and confer with Karleen Murphy on dismissals (.20); review proposed CMC Statement to the Court (.10).
08/11/20	J.A. Moe, II	0.30	179.78	B190	/Sydney Thomson v. St. Francis/ Review and exchange E-Mails with and telephone call to Kathleen Conway on insurance documents sent to Lynn Toma (.10); research and review the documents sent to Ms. Toma in February 2019 (.20).
08/11/20	K. Murphy	0.70	291.55	B190	/ Natalie Nguyen/ Analyze emails from John Moe and Elina Tilman advising of case settlement and update Verity Chart re the same (.1); draft Supplemental Statement re Non-Appearance Case Review advising court of case settlement (.3); telephone call with John Moe re the same (.2); and draft email to Karen Chapman requesting signature on the same (.1).
08/12/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review revised Non Appearance Case Review Statement, approve and E-Mail to Karleen Murphy on proceeding in regard to hearing on August 13th).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	K. Murphy	0.10	41.65	B190	/ Natalie Nguyen/ Analyze and respond to email from Karen Chapman enclosing signed Supplemental Non-Appearance Case Review Statement.
08/13/20	K. Murphy	0.10	41.65	B190	/ Salah / Analyze email from Karen Chapman with case update and analyze update.
08/13/20	K. Murphy	0.10	41.65	B190	/ Ancira Mateo/ Analyze emails enclosing Notice of Preliminary Lien and analyze Notice of Lien.
08/13/20	K. Murphy	0.40	166.60	B190	/ Padilla / Analyze plaintiff's letter re notice of intent to sue and John Moe's letter responding to the same (.1); and prepare updates to Verity Litigation Managements Charts with case summaries (.3).
08/13/20	K. Murphy	0.40	166.60	B190	/ Teas / Analyze plaintiff's letter re notice of intent to sue and John Moe's letter responding to the same (.1); and prepare updates to Verity Litigation Managements Charts with case summaries (.3).
08/13/20	K. Murphy	0.40	166.60	B190	/ German Ramirez / Analyze plaintiff's letter re notice of intent to sue (.1); and prepare updates to Verity Litigation Managements Charts with case summaries (.3).
08/13/20	K. Murphy	0.50	208.25	B190	/ Priscilla C. Chukwumezie / Analyze EEOC and DFEH charge for discrimination and response advising of Right to Sue Letter (.1); analyze emails from Elina Tilman re offer of mediation and status (.1); and prepare updates to Verity Litigation Management Charts with case summary (.3).
08/13/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen/ Analyze Small Claims Court website to determine court orders on 8-13-20 Non-Appearance Case Review, and download and review minute order (.1); and draft email to Verity Team re same and update Verity Deadline Chart with new continued hearing date (.1).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	K. Murphy	0.30	124.95	B190	/ Carcamo/ Telephone call with John Moe re amount of settlement (.1); research emails to determine amount and date of settlement (.1); and update Verity Charts re same (.1).
08/13/20	K. Murphy	0.20	83.30	B190	/ Basulto / Analyze Sedgwick Loss Run Report and notes from call with Kathleen Conway re the same (.1); and prepare updates to Verity Litigation Charts (.1).
08/13/20	K. Murphy	0.20	83.30	B190	/ Eastern, Joann / Analyze Sedgwick Loss Run Report and notes from call with Kathleen Conway re the same (.1); and prepare updates to Verity Litigation Charts (.1).
08/13/20	K. Murphy	0.10	41.65	B190	/ Vasquez / Prepare update to Verity Litigation Management Chart re relief from automatic stay.
08/13/20	K. Murphy	0.20	83.30	B190	/ Gray / Analyze case description and notes from call with Kathleen Conway re case facts (.1); and prepare updates to all Verity Charts re new case information (.1).
08/13/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze case update.
08/13/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze email from Plaintiff's counsel enclosing discovery to co-defendant and email from John Moe to Mike Gonzalez re the same.
08/14/20	K. Murphy	0.20	83.30	B190	/ Woolum / Analyze case update and representation letter from litigation counsel, Mike Gonzalez (.1); and prepare update to Verity Chart re the same (.1).
08/14/20	K. Murphy	0.10	41.65	B190	/ Stephens/ Prepare update to Verity Litigation Management Chart re case closure.
08/14/20	J.A. Moe, II	0.10	59.93	B190	/Dale Wollum v. St. Francis/ Review E-Mail from Karen Chapman and letter from Mike Gonzalez to Mr. Wollum's counsel on investigation of the claim relating to a "slip and fall" at St. Francis.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	J.A. Moe, II	0.20	119.85	B190	/Natalie Nguyen v. St. Francis/ Review E-Mail from Karleen Murphy and review the Court's Minute Order on the non-appearance case review (.10); second E-Mail to Andres Estrada on Claim Numbers for Withdrawal (.10).
08/14/20	J.A. Moe, II	0.10	59.93	B190	/Jessica and Laura Moritaya v. St. Francis/ Review the Discovery propounded by Gary Tysch, and E-Mail to Mike Gonzalez on discovery.
08/14/20	J.A. Moe, II	0.10	59.93	B190	/Nicole Martinez v. St. Francis/ Review E-Mail on and E-Mail to Karleen Murphy on responding to Subpoena and allegations of no response to previously served Subpoena .
08/14/20	J.A. Moe, II	0.30	179.78	B190	/Josefina Robles v. St. Francis/ Revise draft of Withdrawal of Claims (.10); telephone call to Gillian Pluma on identification of Ms. Robles' counsel (.10); E-Mails to Andres Estrada on Claims (.10).
08/17/20	J.A. Moe, II	0.30	179.78	B190	/Leonard Harris v. St. Francis/ Review revised Withdrawal Of Claim, and forward to Elina Tilman with E-Mail requesting approval (.20); review exchanges of E-Mails with Elina Tilman and Melissa Cardenas on execution and return of the Withdrawal Of Claim (.10).
08/17/20	J.A. Moe, II	0.10	59.93	B190	/Marlene Murillo v. St. Francis/ Review letter from counsel notifying St. Francis of malpractice allegations, and confer with Karleen Murphy on fact that Compliant asserts post petition incident,

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/17/20	J.A. Moe, II	0.80	479.40	B190	/Sidney Thomson v. St. Francis/ Review extensive letter from Luzann Fernandez, reviewing the background to and the causes of action asserted by Sidney Thomson and Anthony Barrajas, and analysis of potential exposure (.10); E-Mail from and telephone call with Karen Chapman on information on Policy (.10); research events on or about February 22, 2019 and internal telephone call on 2/22/19 Memorandum (.20); further review of 2/22/19 Memorandum and identifying Declarations' Page (.20); continuing review of document sent by Karen Chapman on February 4th to Dentons, and document sent to Lynn Toma on February 6th, and telephone call with Karen Chapman on document sent to Ms. Toma (.20).
08/17/20	J.A. Moe, II	0.30	179.78	B190	/Maria Padilla v. St. Francis/ Exchange E-Mails with Karleen Murphy on status of a Complaint (.10); research background and existence of a Complaint (.10); telephone call with Ms. Murphy on amending letter to reflect no Complaint has been filed (.10)).
08/17/20	J.A. Moe, II	0.10	59.93	B190	/German Ramirez v. St. Francis/ Confer with Karleen Murphy on Notice Of Intent Letter sent to St. Francis.
08/17/20	K. Murphy	0.10	41.65	B190	/ Ramirez / Analyze email from Verity re matter and draft email to Karen Chapman to determine if there is a Notice of Intent letter from an attorney for purposes of updating Verity Case Management List.
08/17/20	J.A. Moe, II	0.30	179.78	B190	/Josefina Robles v. St. Francis/ Revise the Withdrawal Of Claim, researching the background including Order entered on November 27, 2018 (.20); telephone call to and return call from Gillian Pluma's office on completing the Withdrawal (.10).
08/18/20	K. Murphy	0.10	41.65	B190	/ Bustamante / Analyze email from Karen Chapman with case update and analyze update.
08/18/20	K. Murphy	0.10	41.65	B190	/Garcia / Prepare for upcoming Status Conference re Bankruptcy by conferring with John Moe re recent updates in Bankruptcy Court.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/20	J.A. Moe, II	0.10	59.93	B190	/Priscilla Chukwumezie v. St. Francis/ Review Charge Of Discrimination asserted by Ms. Chukwumezie.
08/18/20	J.A. Moe, II	0.50	299.63	B190	/Maria Padilla v. St. Francis/ Review, research and consider previous letter sent to Attorney Farid Yaghoubtil, then revise letter previously sent to Mr. Yaghoubtil, on imposition of the Bar Date and the automatic stay.
08/18/20	J.A. Moe, II	0.20	119.85	B190	/Manimino Correa v. St. Francis/ Review and exchange E-Mails with Lorraine Hall and telephone call from Ms. Hall on relief form stay in accordance with the Plan (.10); confer with Nick Koffroth on informing the Courts of fact that certain parties have relief from stay in accordance with the Plan (.10).
08/18/20	J.A. Moe, II	0.20	119.85	B190	/Josefina Robles v. St. Francis/ Complete draft of the Withdrawal Of Claim and E-Mail to Gillian Pluma (.10); telephone call from Gillian Pluma's secretary on completing the Withdrawal (.10).
08/19/20	J.A. Moe, II	0.20	119.85	B190	/Aaron Raj v. St. Francis/ Exchange E-Mails with Elina Tilman on dismissal of the DLSE Compliant, and confer with Elina Tilman, then Karleen Murphy, on dismissal (.10); telephone call returned to Aaron Raj on fact that Dentons represents the Debtors and not Mr. Raj, and reviewing facts on Notices sent, no Claim filed and DLSE closing case (.10).
08/19/20	J.A. Moe, II	0.10	59.93	B190	/Mee Sook Cho v. St. Francis/ Review with Karleen Murphy expansion of the standard Case Management Conference Statement to include references to the treatment of Class 9 Claimants.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/19/20	J.A. Moe, II	0.60	359.55	B190	/Iris Hernandez v. St. Francis/ Review Notice and the Court's extensive Minute Order Re Sanctions And Dismissal, and exchange E-Mails with Karleen Murphy on September 2nd hearing and preparing an expanded CMC Statement (.20); additional calls with Karleen Murphy on contents of the expanded CMC (.10); review draft of the proposed Case Management Conference Statement, then research/review Notices and Order on sales of four Hospitals (.30).
08/19/20	J.A. Moe, II	0.10	59.93	B190	/Maryela Bustamante v. St. Francis/ Preliminarily review analysis of the case provided by Jessica Cynowiec.
08/19/20	K. Murphy	0.20	83.30	B190	/ Raj/ Analyze multiple emails from Elina Tilman and John Moe re telephone call from Mr. Raj and DSLE notice of case closure (.1); and prepare update to Verity Litigation Management Chart (.1).
08/19/20	K. Murphy	1.60	666.40	B190	/Iris Hernandez / Analyze June 22, 2020 minute order setting Status Conference and OSC (.1); confer with John Moe re the same (.1); research court docket and prior minute orders to determine case status and history of prior status conferences and non-appearance case reviews (.4); and prepare first draft of long version of Status Conference Statement re Bankruptcy and OSC re Sanctions and Dismissal (1.0).
08/19/20	K. Murphy	0.20	83.30	B190	/Iris Hernandez / Analyze emails from John Moe enclosing Notice of Occurrence of Closing Date of Sale of SFMC and Notice re Seton to prepare for drafting edits to first draft of Status Conference Statement re Bankruptcy (.1); and telephone call to John Moe re the same (.1).
08/20/20	K. Murphy	0.30	124.95	B190	/Hernandez / Confer with John Moe re edits to first draft of Status Conference Statement Re Bankruptcy.
08/20/20	K. Murphy	0.10	41.65	B190	/ Lourdes Mares / Analyze email from CT Corporation re notice of service of subpoena and email from Elina Tilman re the same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	J.A. Moe, II	0.90	539.33	B190	/Iris Hernandez v. St. Francis/ Confer with Karleen Murphy on revising the Response to the Order To Show Cause Re Sanctions And Dismissal, reviewing the proposed inserts on the sale of St. Francis and Seton, and the confirmation of the Plan (.40); review revised Statement and confer with Karleen Murphy on revisions (.30); review second revision, and confer with Ms.Murphy on one minor revision (.20).
08/20/20	J.A. Moe, II	0.30	179.78	B190	/Federico Fuentes v. St. Francis (and Spivak)/ Review and respond to E-Mail from Mike Gonzalez on upcoming Mediation, and bankruptcy defenses (.20); E-Mail to Andres Estrada on Notices served and Claims filed (.10).
08/20/20	K. Murphy	0.10	41.65	B190	/ Fuentes / Analyze email from Karen Chapman and Mike Gonzalaz re potential mediation and John Moe's response re same.
08/21/20	J.A. Moe, II	0.70	419.48	B190	/Natalie Nguyen v. St. Francis/ Review for response from Natalie Nguyen and telephone call to and E-Mail from to Ms. Nguyen (.10); telephone calls from Elina Tilman on delivery of payment to Ms. Nguyen (.20); telephone call from Elina Tilman on payment, and E-Mail to Roberto Dino on confirming delivery of check (.20); review Roberto Dino's confirmation and two E-Mails to Natalie Nguyen on executing Withdrawals and delivery of the payment (.20).
08/24/20	K. Murphy	0.10	41.65	B190	/ Fuentes / Analyze and respond to email from John Moe re case status and future hearings on calendar.
08/24/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze email from co-defendant enclosing Health Net of CA's Answer to Plaintiffs' Fourth Amended Complaint.
08/24/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze email from co-defendant enclosing Conifer's Answer to Plaintiffs' Fourth Amended Complaint and draft email to Mike Gonzales re the same.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	K. Murphy	0.50	208.25	B190	/ Sprownson/ Prepare for drafting Case Management Statement/Status Conference re Bankruptcy by analyzing Superior Court website to confirm upcoming CMC and Status Conference Re Bankruptcy date and minute order re the same (.1); analyze prior conference report and date of filing Notice of Automatic Stay (.1); draft Status Conference Statement re Bankruptcy (.2); and draft email to John Moe re the same (.1).
08/24/20	J.A. Moe, II	0.10	59.93	B190	/Federico Fuentes v. St. Francis/ Review Notice as to Case Management Conference and E-Mail to Karleen Murphy on coverage,
08/24/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Review E-Mails from Natalie Nguyen and E-Mail from Roberto Dino, on clearing of check payable to Natalie Nguyen.
08/24/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze multiple emails from Elspeth Paul, Karen Chapman, and Hope Levy Biel re insurer reporting.
08/26/20	J.A. Moe, II	0.10	59.93	B190	/Priscilla Chukwumezie v. St. Francis/ Telephone call from Elina Tilman on responding to demand for documents in regard to an investigation.
08/27/20	J.A. Moe, II	0.10	59.93	B190	/Priscilla Chukwumezie v. St. Francis/ Telephone call from Elina Tilman on resolution of issues with State Agency on production of documents.
08/27/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze Karen Chapman's email inquiry re insurance policy declaration page per discovery request.
08/27/20	K. Murphy	0.10	41.65	B190	/ Morataya / Analyze email from litigation co-defendant Conifer enclosing Notices of ERRATA to previously served objections and responses to Plaintiffs' written discovery.
08/28/20	J.A. Moe, II	0.20	119.85	B190	/Aida Iniguez v. St. Francis/ Review E-Mails from Karen Chapman and Verity's Superior Court Counsel on insurance, and respond to E-Mails on producing the Policies.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/28/20	K. Murphy	0.10	41.65	B190	/ Iniguez / Analyze John Moe's response to Karen Chapman's inquiry re insurance policy in discovery.
08/29/20	J.A. Moe, II	0.10	59.93	B190	/Josefina Robles v. St. Francis/ Review Kathleen Conway specific direction on payment of the settlement, and forward to Karleen Murphy with an E-Mail on how to proceed.
08/29/20	K. Murphy	0.10	41.65	B190	/ Robles / Analyze multiple emails from John Moe, Kathleen Conway, and Elspeth Paul re settlement funding.
08/30/20	K. Murphy	0.20	83.30	B190	/ Robles / Analyze multiple emails from John Moe, Kathleen Conway, and Karen Chapman, and report from defense litigation counsel re hearing on good faith settlement and minor's compromise; and draft response to the same.
08/30/20	J.A. Moe, II	0.10	59.93	B190	/Natalie Nguyen v. St. Francis/ Exchange E-Mails with, identify and transmit to Karleen Murphy for filing the Dismissals of the two State Court Cases.
08/31/20	K. Murphy	0.20	83.30	B190	/ Sprownson/ Telephone call with John Moe re draft of Status Conference Statement re BK (.1); and draft email to Andres Estrada of KCC requesting information on Proof of Claim (.1).
08/31/20	J.A. Moe, II	0.20	119.85	B190	/Tammy Sprownson v. St. Francis/ Confer with Karleen Murphy on necessity to research background on Notice, scheduled Claim and filed Claim (and on Claims of Iris Hernandez and Sinthia Cortes) .
08/31/20	J.A. Moe, II	0.30	179.78	B190	/Aaron Raj v. St. Francis/ Review Shirley Cho's E-Mail and Aaron Raj's voice mail, then prepare E-Mail to Shirley Cho on conference with Mr. Raj.
09/01/20	K. Murphy	0.10	41.65	B190	/ Morataya/ Analyze email from co-defendant Conifer re document production.
09/01/20	K. Murphy	0.10	41.65	B190	/ Iris Hernandez/ Telephone call with John Moe to prepare for upcoming Status Conference re Bankruptcy.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	K. Murphy	0.10	41.65	B190	/ Khajehkarameddinm/ Analyze and respond to email from John Moe re upcoming status conference.
09/01/20	K. Murphy	0.10	41.65	B190	/ CT Corp - Willy Zavala / Analyze CT Corp Notice of service of subpoena for employment records and emails from Karen Chapman and Elina Tilman re same.
09/01/20	K. Murphy	0.30	124.95	B190	/ Sprownson / Analyze email from Andres Estrada reporting on results of request for information re receipt of standard notices (.1); and draft revised Status Conference Statement re Bankruptcy (.2).
09/01/20	K. Murphy	0.40	166.60	B190	/ Sinthia Cortes / Analyze email from Andres Estrada reporting on results of request for information re receipt of standard notices (.1); and draft revised Status Conference Statement re Bankruptcy (.3).
09/01/20	J.A. Moe, II	0.10	59.93	B190	/KhajehKarameddinm v. St. Francis/ Review Notice on Case Management Conference and review with Karleen Murphy.
09/01/20	J.A. Moe, II	0.10	59.93	B190	/Iris Hernandez v. St. Francis/ Review Notice of upcoming hearing and E-Mail to Karleen Murphy on preparing for the OSC and Case Management Conference.
09/02/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen/ Analyze court notice of rejection of attempted filing of Request for Dismissal for Small Claims matter due to issue of Plaintiff's fee waiver (.1); and conferred with John Moe and Derry Kalve re preparing revised document for re-submission to court (.1).
09/02/20	J.A. Moe, II	0.10	59.93	B190	/Ancira Mateo v. St. Francis/ Review CMC Statement filed by Mitchell Silberburg and E-Mail to Kathryn Howard.
09/02/20	J.A. Moe, II	0.10	59.93	B190	/Iris Hernandez v. St. Francis/ Review E-Mails on and confer with Karleen Murphy on Court's continuance of hearing and Plaintiff's Counsel's Motion To Be Relieved As Counsel.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/20	J.A. Moe, II	0.40	239.70	B190	/Sinthia Cortes v. St. Francis/ Review draft of proposed Case Management Conference Statement (.10); review the provisions of the Plan on injunction and release, and revise and expand the Statement (.20); confer with Karleen Murphy on revising and expanding the CMC Statement, as a model for other Statements (.10).
09/02/20	K.M. Howard	0.40	100.30	B190	Analysis of CMC Statement and reviewed and revised Litigation Management Chart.
09/02/20	K. Murphy	1.80	749.70	B190	/ Hernandez / Prepare for attending Status Conference and OSC by analyzing prior court minute orders to create timeline of prior conferences, and analyze Status Conference Statement re Bankruptcy (.5); analyze court's tentative order in advance of conference (.1); attend Status Conference (1.0); telephone call to John Moe re same (.1); and draft update to Verity Deadline Chart with continued conference date (.1).
09/02/20	K. Murphy	0.10	41.65	B190	/ Ancira / Analyze and respond to email from John Moe re identification of defense litigation counsel for SFMC.
09/02/20	K. Murphy	0.60	249.90	B190	/ Sinthia Cortes / Telephone call with John Moe to discuss Draft 2 of Revised Status Conference Statement re Bankruptcy (.1); and prepared revisions for draft #3 (.5).
09/03/20	K. Murphy	0.30	124.95	B190	/ Sinthia Cortes / Telephone call with John Moe re first draft of Status Conference Statement re Bankruptcy (.2); and prepare edits to draft statement (.1).
09/03/20	K. Murphy	0.10	41.65	B190	/ Sprownson / Telephone call with John Moe re first draft of Status Conference Statement re Bankruptcy.
09/03/20	K. Murphy	0.10	41.65	B190	/ Iris Hernandez / Telephone call with John Moe re preparing Further Status Conference Statement re Bankruptcy.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	K. Murphy	0.20	83.30	B190	/ Natalie Nguyen/ Analyze court notice of rejection of attempted filing of Request for Dismissal for Superior Court (Limited Jurisdiction matter) due to issue of Plaintiff's fee waiver (.1); and conferred with John Moe and Derry Kalve re preparing revised document for re-submission to court (.1).
09/03/20	J.A. Moe, II	0.10	59.93	B190	/Juvenal Nunez and Michael Gonzalez/ Telephone call from Elina Tilman on Notices, reviewing terms of service
09/03/20	J.A. Moe, II	0.50	299.63	B190	/Sinthia Cortes v. St. Francis/ Review and revise the expanded draft of the Case Management Conference Statement (.20); make further revisions to the expanded CMC Statement (.10); confer with Karleen Murphy, together making additional corrections (20).
09/03/20	J.A. Moe, II	0.10	59.93	B190	/Iris Hernandez v. St. Francis/ Confer with Karleen Murphy on continued hearing date and opportunity to file revised Case Management Conference Statement on the required dismissal of the Case.
09/03/20	J.A. Moe, II	0.10	59.93	B190	/Tammy Sprowson v. St. Francis/ Telephone call with Karleen Murphy on creating a Case Management Conference Statement on the required dismissal of the Case.
09/04/20	J.A. Moe, II	0.10	59.93	B190	/Priscilla Chukwumezie v. St. Francis/ Review and respond to E-Mail from Karen Chapman, and letter from Alan Zhao of AIG on coverage of claim.
09/04/20	J.A. Moe, II	0.10	59.93	B190	/Lourdes Mares v. St. Francis/ Review E-Mail from Karen Chapman, and letter from Alan Zhao on issue of coverage on the claim.
09/04/20	J.A. Moe, II	0.10	59.93	B190	/Jessica Moritaya v. St. Francis/ In regard to the review of Claims identified in the Master Chart, confer with Karleen Murphy on necessity to review Fourth Amended Complaint and how to ascribe exposure to the Case.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	K. Murphy	0.10	41.65	B190	/ Aragon / Analyze Superior Court Website to confirm date for upcoming Status Conference re Bankruptcy.
09/04/20	K. Murphy	0.10	41.65	B190	/ Morataya/ Draft email to Karen Chapman re status of reporting to carrier and coverage decision (.1); and analyze and respond to email from Elina Tilman seeking copy of 4th Amended Complaint.
09/04/20	K. Murphy	0.10	41.65	B190	/ Natalie Nguyen/ Analyze and respond to email from Derry Kalve re Plaintiff's fee waiver for revised Request for Dismissal.
09/04/20	K. Murphy	0.10	41.65	B190	/ Sprownson/ Analyze Plaintiff's status conference statement.
<b>Subtotal</b>		<b>41.80</b>	<b>20,829.51</b>		



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B210 - Business Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	J.A. Moe, II	0.20	119.85	B210	In regard to the sale of St. Francis (and Seton) , telephone call to Abigail Robles on reconciliation of the Alcan Visions' consigned product held at Hospitals.
09/01/20	R. Richards	0.40	289.20	B210	Emails re equipment lessor inquiries and responding to same.
	<b>Subtotal</b>	<b>0.60</b>	<b>409.05</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B240 - Tax Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	N. Carson	0.70	288.58	B240	Draft and correspond re transfer tax affidavits.
08/11/20	M. Maryn	0.70	560.00	B240	Analyze federal tax law considerations of the transfer of Form W-4s to the asset purchaser.
08/11/20	T. Santoli	2.40	1,917.60	B240	Call with S. McCandless regarding tax issues related to forms W-4 (.2); call with M. Maryn re: same (.1); review of emails re: same (.3); attention to tax issues related thereto (1.6); draft of email to M. Maryn and S. McCandless re: same (.2)
08/12/20	N. Carson	0.70	288.58	B240	Draft and revise transfer tax affidavits.
08/19/20	J.A. Moe, II	0.10	59.93	B240	In regard to allocation and calculation of tax obligations, review John Schlant's and Robert Richard's E-Mails on time to determine and determination of the tax obligations related to the sale of St. Francis and Seton.
<b>Subtotal</b>		<b>4.60</b>	<b>3,114.69</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B250 - Real Estate**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	M.M. Welch	1.00	267.75	B250	Read email from Tania Moyron regarding St. Francis - UCCs (.10); Read email from Adam Dondoyano: RE: St. Francis - UCCs(.10); Composed email to Colson@mwe.com regarding St. Francis - UCCs (.20) Closing checklist conference call (.60).
08/13/20	M.M. Welch	1.40	374.85	B250	Prime/Verity - Call to Finalize Transition Services Agreement (1:0); Read email from Peter Chadwick of Berkeley Research Group regarding Prime/Verity - Call to Finalize Transition Services Agreement (.10); Review TSA Schedules received from Peter Chadwick (.20); Review Schedule "C" received from Peter Chadwick (.10).
08/21/20	M.M. Welch	2.60	696.15	B250	E-mail communication from Attorney Moyron (.10); respond to email communication from Attorney Moyron (.10); read email communication from Jonathan Emerson of Berkeley Research Group(.10); review spreadsheet received from Berkeley Research Group identifying liens (.20); Read email from Claude Montgomery regarding Verity - Mechanic Liens(.10); conference call with Dentons' team to discuss release of the liens (1.00); research lien searches to locate the mechanics' liens identified on spreadsheet(1.00).
08/22/20	M.M. Welch	6.00	1,606.50	B250	Revise drafts of 13 lienholder letters (2.60) ; review recorded mechanics liens (1.00); revise drafts of release of mechanics liens (.80).; research all CSC Global Lien Searches Results for recorded mechanics liens for Royal West Development Inc. and PDQ Enterprises Inc .(1:50); email communication to Jonathan Emerson of Berkeley Research Group regarding contact information for lienholders (.10).
08/24/20	M.M. Welch	1.10	294.53	B250	Read email from Tania Moyron: regarding Bondholder Lien Releases (.10); continue searching CSC Global Lien Search Results for recorded Mechanics' Lien for PDQ Enterprise , Inc., (1.0) .

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	M.M. Welch	0.20	53.55	B250	Read email from Jon Emerson of RBG regarding Mechanic Liens (.10); read email from George Medina regarding Mechanic Liens (.10).
08/26/20	M.M. Welch	0.90	240.98	B250	Read email from George Medina regarding St. Vincent - Service - Mechanics' Lien Holders (.10); draft Release of Mechanics' Lien for PDQ Enterprise Inc. (.20) ; draft Lienholders Release Letter for PDQ Enterprise Inc. (.20); email communications with Jon Emerson of Berkeley Research Group regarding mechanics' liens (.20); email communications with Attorneys Montgomery and Moyron regarding mechanics' liens (.20).
08/27/20	M.M. Welch	2.40	642.60	B250	Revise drafts of lienholders' letters to include contact information for each lienholder (2.0); email communication with jon Emerson of Berkeley Research Group (.20); email communications with Lucas Kmiec of Chicago Title requesting copies of recorded Mechanics' Liens for FTG Builders (.20).
08/31/20	M.M. Welch	10.20	2,731.05	B250	Email communications with Jon Emerson of Berkeley Research Group regarding Mechanics' Liens (1.0); email communications with George Medina discussing Order from Bankruptcy Court approving sale of assets (.50); telephone conversation with Attorney Richter discussing UCC3 Terminations and Deeds of Trusts Releases (.30); telephone conference with Jon Emerson of Berkeley Research Group and Attorney Richter discussing the delivery of Mechanics' Liens (.20); edited Mechanics' Lienholders' letters for Saint Vincent Medical Center, Saint Francis Medical Center, and Seton Medical to include the Order approving sale of Assets (2.15); draft final Mechanics' Lienholders' letters on Verity's letterhead to include Peter Chadwick's signature and Exhibit "A"(4.70); email communications with Mechanics' Lienholders circulating letters and Releases of Mechanics' Liens (1.4).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	M.M. Welch	7.20	1,927.80	B250	Finalize drafts of Lienholders' Letters and circulate by way of email Lienholders' Letters and Releases (5.50);email communications with Jon Emerson regarding Mechanics' liens for Royal West Development (.60); email communications regarding - SVMC - Hams Electric - Mechanics' Lien (.20); read email from Carolyn Richter: Verity MOB Financing LLC - cancellation of DOT, Security Agreement & Fixture Filings with Assignment of Rents & Leases (San Mateo and LA counties) (.20); read email from Lucas Kmiec of Chicago Title regarding U. S. Bank National Association - as Master Trustee- sample substitution and reconveyance (.10); email communications with lienholders regarding Lien Releases (.30); revises spreadsheet tracking executed Lien Releases (.30)..
09/02/20	M.M. Welch	2.90	776.48	B250	Email communications regarding Richter: Verity MOB Financing LLC - cancellation of DOT, Security Agreement & Fixture Filings w Assignment of Rents & Leases (San Mateo and LA counties) (.30); email communications regarding UMB Bank Effective Date Lien Releases (.20); continue to revise and circulate by e-mail lienholders' letters and release of Mechanics' liens (1:6); Email communications from Carolyn Richter regarding - UCC Terminations(.30); revise spreadsheet tracking receipt of executed Releases (.20); email communications with Jon Emerson regarding Mechanics' liens (.30).
09/03/20	M.M. Welch	3.00	803.25	B250	Email communications with Jon Emerson regarding mechanics liens (.20); draft and circulate lienholders letter for California Industrial (.50); telephone conversation with Attorney Westhoff regarding escrowed amounts spreadsheet and paying contractors and subcontractors directly (.20); telephone conversation with Attorney Carson regarding errors in escrowed amounts and errors on the spreadsheet (.10); email communication with Jon Emerson regarding mechanics' liens (.20);

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					email communication with Beata Lewis of Chicago Title regrading Releases and opening Escrow (.20); email communications regarding Terminations (1.40); email communications regarding the Swinerton Builders lien (.20).
09/04/20	M.M. Welch	5.70	1,526.18	B250	Email communications with Jon Emerson regarding spreadsheets sent to Chicago title and subcontractors to be paid and releases of Mechanics' Liens (.50); email communication with Attorney Westoff regarding payment to subcontractors (.20); telephone communication with Beata Lease of Chicago Title Company regarding escrow letter (.20); telephone conversation with Attorney Montgomery regarding mechanics' liens, Escrow Letter and amount of wire to payout mechanic's liens (.20); review spreadsheet to compare with spreadsheets payoff amounts for each lienholder provided to Chicago Title (.70);e-mail communications with lienholders regarding documents being held in escrow by Chicago Title until payment is remitted (2.40); draft Escrow Instructions letter (.20); circulate draft of Escrow Letter to Beata Lewis at Chicago Title (.10); review executed copies of Mechanics' liens received from lienholders(.20); update spreadsheet tracking receipt of pdf copies of Executed Mechanics' Liens (.30);telephone conversation with counsel for Royal West Development regrading revise letters for Royal West Development and revised payoff amounts (.20); revise lienholders' letters for Royal West and circulate revise letters to lienholder's counsel (.30); revise and circulate to revised letter for MGH Painting with revised payoff amount (.20).
<b>Subtotal</b>		<b>44.60</b>	<b>11,941.67</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	K. Murphy	0.20	83.30	B300	Confer with John Moe requesting amount of SIR information on Sorto (.1); analyze Verity Chart to determine the same and further calls with John Moe re details of the same (.1).
08/04/20	J.A. Moe, II	1.10	659.18	B300	In regard to the review of the Administrative Claims in connection with the Plan, telephone call to Barry Chatz on Claim of Alcon Vision and the components of the Administrative Claim (.10); telephone call from George Apostolide on Alcon Claim (.10); further research on Alcon Claim reviewing Notices on assumed Contracts and the Alcon Proof Of Claim (.30); telephone call to George Apostolides on Claim (.10); E-Mail to Admin Claim Group on Claim of Alcon Vision (.10); E-Mail to Messrs. Chadwick, Emerson and Schlant on Verity personnel who deal with Alcon Vision (.10); E-Mail to Guy Phipps and Regina Mendoza on Claim (.10); exchange E-Mails with Regina Mendoza and confer with John Schlant on necessity to obtain information on sales and consigned product to be returned to Alcon (.10). two telephone calls from George Apostolides on additional information on Alcon and rejection of the contracts (.10).
08/10/20	J.A. Moe, II	0.20	119.85	B300	In regard to the review of Administrative Claims in connection with the Plan, review Applecare Medical Group's request for allowance of an Administrative Claim and Stipulation.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	J.A. Moe, II	0.70	419.48	B300	In regard to the review of Administrative Claims in connection with the Plan, exchange E-Mails with Tania Moyron and Henry Kevane on amount of reserve for Moritaya v. St. Francis and Conifer (.10); review background to the Claim (.10); telephone call returned from Michael Gonzalez reviewing allegations and reserve for Conifer (.20); telephone call to John Schlant on no reserve required for Moritaya (.10); confer with Mike Gonzalez on amount of reserve (.10); E-Mail to Tania Moyron and Henry Kevane on additional Footnote to Exhibit(.10).
08/17/20	J.A. Moe, II	0.10	59.93	B300	In regard to the 503(b)(9) Claims, review and exchange E-Mails with Darryl Laddin on Claim asserted by Sysco, and telephone call to Mr. Laddin's office on projected Effective Date of the Plan.
09/04/20	J.A. Moe, II	0.40	239.70	B300	In regard to the analysis of exposure on litigation: Telephone call to Karleen Murphy on updating the "Master Chart," as to EPL and GL/PL Cases, discussing in detail the Moritaya Case (.20); additional telephone call from Elna Tilman on D & O Coverage, and other coverage, in the Moritaya Case (.20).
<b>Subtotal</b>		<b>2.70</b>	<b>1,581.44</b>		



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	J.A. Moe, II	0.30	179.78	B310	In regard to the reduction of large general unsecured claims, exchange E-Mails with Andres Estrada on Claim of Josefina Robles relating to St. Francis, and prepare insert on Withdrawal Of Claim for settlement agreement and transmit to Gillian Pluma (.20); review and correct the references to the Claim in the Withdrawal Of Claim and return for revision (.10).
08/03/20	J.A. Moe, II	0.30	179.78	B310	In regard to the reduction of large general unsecured claims, prepare Withdrawal Of Claim to be filed by Leonard Harris as to St. Francis.
08/04/20	J.A. Moe, II	0.10	59.93	B310	In regard to reduction of large general unsecured claims, review draft Withdrawal Of Claim for Leonard Harris and E-Mail to and telephone call from Elina Tilman on identification of Harris Attorneys.
08/04/20	J.A. Moe, II	0.10	59.93	B310	/Aida & Francisco Iniquez v. St Francis/ Exchange E-Mails with Mariam Danielyan on execution of the Withdrawal of Claims; confirm E-Mail sent.
08/07/20	K.M. Howard	0.20	50.15	B310	Analysis of order approving stipulation between St. Francis and Angeles IPA for rejection of risk-sharing agreement to determine additional requirements set by the court.
08/14/20	J.A. Moe, II	0.20	119.85	B310	In regard to the reduction of large general unsecured claims, review Withdrawal Of Claim of Leonard Harris and transmit with E-Mail to Elina Tilman and An Ruda.
08/18/20	J.A. Moe, II	0.50	299.63	B310	/Aaron Raj v. St. Francis/ Telephone call from Aaron Raj on payment to Mr. Raj, review of Chart including on the Raj claim, requesting copy of judgment, and reviewing the necessity to determine whether he holds a claim (.20); E-Mail to Karleen Murphy and Elina Tilman, and telephone call from Ms. Tilman on no judgment (.10); review letter sent to the DLSE on why Mr. Raj cannot proceed and review Ms. Tilman's E-Mail to Nelda Contreras on

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					Case Closure Letter (.10); review additional E-Mails from Karleen Murphy and Elina Tilman, including resending letter to Ms. Contreras (.10).
08/18/20	J.A. Moe, II	0.50	299.63	B310	/Natalie Nguyen v. St. Francis/ Review and revise first complete draft of Withdrawal Of Claims on Natalie Nguyen (.20); review Withdrawal of Ms. Nguyen's Motion For Relief from Stay (.10); make one correction to the Withdrawal of Claim (.10); exchange E-Mails with Andres Estrada confirming the identification of the Claims (.10).
08/18/20	J.A. Moe, II	0.10	59.93	B310	/Natalie Nguyen v. St. Francis/ In regard to the withdrawal of multiple general unsecured claims, review the draft Withdrawal Of Claims.
08/19/20	J.A. Moe, II	0.10	59.93	B310	/Natalie Nguyen v. St. Francis/ Second E-Mail to Andres Estrada confirming the Claims identified in the Withdrawal Of Claims.
08/20/20	J.A. Moe, II	0.20	119.85	B310	/Natalie Nguyen v. St. Francis/ Review and confirm Withdrawal Of Claims is complete, then E-Mail to Natalie Nguyen on receipt of payment (.10); exchange E-Mails with Elina Tilman on payment (.10).
08/26/20	J.A. Moe, II	0.40	239.70	B310	/Natalie Nguyen v. St. Francis/ Review Elina Tilman's E-Mail and canceled check payable to Natalie Nguyen, then E-Mail to Natalie Nguyen on canceled check and request for execution and return of Withdrawals, and Ms. Nguyen's refusal to comply with terms of the Settlement Agreement (.20); exchange additional E-Mails with Natalie Nguyen on executing the two Withdrawals (.20);
<b>Subtotal</b>		<b>3.00</b>	<b>1,728.09</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**B320 - Plan and Disclosure Statement (incl. Business Plan)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K.M. Howard	0.20	50.15	B320	Analysis of stipulation pertaining to the resolution of conformation objection of Aetna Insurance Company.
08/07/20	K.M. Howard	0.40	100.30	B320	Analysis of order and stipulation continuing reply deadline related to Applecare's confirmation objection and reviewed and revised Critical Dates Memorandum.
08/07/20	K.M. Howard	0.40	100.30	B320	Analysis of order and stipulation continuing reply deadline related to confirmation objection filed by Scan Health Plan and reviewed and revised Critical Dates Memorandum.
08/10/20	K.M. Howard	0.20	50.15	B320	Analysis of order approving second stipulation continuing reply deadline related to confirmation objection filed by Applecare and reconciled same to Critical Dates Memorandum.
08/10/20	K.M. Howard	0.20	50.15	B320	Analysis of order approving third stipulation continuing reply deadline related to Applecare's confirmation objection and reconciled same to Critical Dates Memorandum.
08/13/20	K.M. Howard	0.30	75.23	B320	Analysis of Supplement regarding the Resolution of Applecare's Confirmation Objection and Redline of Modified Second Amended Joint Plan of Liquidation to determine additional requirements and deadlines.
08/17/20	J.A. Moe, II	0.10	59.93	B320	Review E-Mail from Darryl Laddin and telephone call to Mr. Laddin on anticipated Effective Date of the Plan Of Liquidation; E-Mail from Darryl Laddin acknowledging receipt of E-Mail.
09/01/20	T. Moyron	0.30	179.78	B320	Analyze matters related to dissolution of certain debtors and correspond with M. Garms, et al., re same.
09/04/20	K. Murphy	0.20	83.30	B320	/ Morataya / Confer with John Moe re case status.
<b>Subtotal</b>		<b>2.30</b>	<b>749.29</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	S. McCandless	0.50	399.50	EMP	Review communication from H. Levy-Biehl regarding Prime general request for Verity provider information (.20); review backup communications to same (.10); respond to same (.20).
08/04/20	S. McCandless	0.70	559.30	EMP	Review and analyze J. Richlin communication to UNAC regarding employee authorization for release of medical information and UNAC's response (.30); respond to team H. Levy-Biehl and T. Moyron regarding same (20); communicate with A. Ruda regarding same (.20).
08/04/20	A. Shiran	0.30	154.35	EMP	Review UNAC comments to release post offer information (.1) discuss same with S. McCandless (.2).
08/05/20	S. McCandless	0.30	239.70	EMP	Review information received from P. Chadwick regarding various pending Prime employment-related requests (.20); related further communications with clients and attorney team (.10).
08/07/20	S. McCandless	1.70	1,358.30	EMP	Discuss time line for employee separations with A. Youssefi in context of pending same (.20); review Prime request for protected employee information (.30); communicate with A. Youssefi regarding same (.30); related review of APA with Prime and earlier research for sale to Santa Clara County as related to same (.70); provide initial response to team and clients regarding same (.20).
08/07/20	A. Shiran	1.10	565.95	EMP	Correspondence regarding status and timeline of sales (.3) evaluate transfer of employee information and limitations of same (.6); review correspondence relating to request for transfer of data from Prime (.2)
08/07/20	A. Shiran	1.00	514.50	EMP	Evaluate further employee correspondence (.8); discuss same with S. McCandless (.2)

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/20	T. Moyron	1.20	719.10	EMP	Analyze J. Richlin, et al. emails re accrued payroll (.3); analyze excel file to Prime (.3); conference call with R. Adcock, re same (.2); analyze H. Levy-Biehl, et al., correspondence re Prime requests re employee matters (.4).
08/08/20	S. McCandless	2.50	1,997.50	EMP	Provide detailed information to team and clients regarding Prime's request for protected employee information (.70); further related research for same (.60); communicate with T. Moyron and H. Levy-Biehl regarding same (.30); review Prime closing statement for confidential information (.70); communicate with team and clients regarding same (.20).
08/09/20	S. McCandless	3.10	2,476.90	EMP	Client call to discuss Prime request for confidential employee information (.40); provide further analysis in preparation for client call (.60); further related review of relevant information (.50); review H. Levy-Biehl's related communications with J. Richlin (.30); various further related communications with H. Levy-Biehl and T. Moyron (.70); provide further related legal analysis to team (.60).
08/09/20	A. Shiran	1.30	668.85	EMP	Telephone conference with client and legal team to discuss Prime data request (.4); evaluate and analyze data request and information to be provided pursuant to same (.4); review and analyze numerous correspondence regarding same (.5).
08/09/20	T. Moyron	0.70	419.48	EMP	Call with R. Adcock, H. Levy-Biehl, et al. re labor matters (.4); analyze H. Levy-Biehl, et al. re same (.3).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	A. Shiran	4.30	2,212.35	EMP	Further evaluate data requests from Prime and prepare further detailed response (.8); review correspondence with Prime regarding data requests (.2); discuss data request , scope of data to be provided; privacy considerations relating to same, and transmission and encryption and security requirements with S. McCandless (1.4); review and analyze employee data and handling of same in context of sale (.3). valuate and analyze transfer of tax withholding information and conduct research relating to same (1.2); discuss tax information transfer with S. McCandless (.4)
08/10/20	S. McCandless	5.10	4,074.90	EMP	Review and analyze earlier results of Bartko research on privacy issues as related to Prime request for employee payroll-related data (.60); communicate with T. Moyron regarding same (.30); review H. Levy-Biehl's related communication with J. Richlin (.10); research regarding protection of social security numbers (.40); analyze and discuss details of request and response and means of protecting information with A. Youssefi, including recommendations to be made to client for protection of same (1.40); further communicate with S. Maizel and T. Moyron regarding same (.20); review portion of St. Francis APA as related to same (.30); review J. Richlin additional request for tax withholding information (.20); review H. Levy-Biehl's and R. Adcock's responses to same (.10); discuss Prime's additional request for withholding information with A. Youssefi (.40); review and analyze related results of IRS research (.60); email to T. Moyron with details of tax research (.50).
08/11/20	P.Z. Stockburger	0.90	569.93	EMP	Confer with counsel regarding data transfers and protections (.3); prepare notice relating to the same (.6).
08/11/20	S. Maizel	0.10	80.00	EMP	Telephone conference with S. McCandless re WARN Act issues.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	A. Shiran	3.10	1,594.95	EMP	Draft hospital employee WARN update (.6); draft two Union WARN update letters to union representatives (.9); discuss language for employee communications with S. McCandless (1.1 ); review and incorporate bankruptcy team comments (.3); numerous correspondence with client regarding employee correspondence (.2)
08/11/20	A. Shiran	3.00	1,543.50	EMP	Evaluate and analyze privacy implications as related to employee matters upon close (.4); discuss privacy implications and handling of employee records with S. McCandless (.9); telephone conference with P. Stockburger and S. McCandless regarding California privacy laws as applicable to employee data (.2); discuss response to Prime data request with S. McCandless (.8); draft response to Prime data request (.7).
08/11/20	S. McCandless	3.90	3,116.10	EMP	Consider and prepare communication to R. Adcock and team regarding handling of employee separations in context of anticipated closure and possible delay of a few days (.50) (split with Seton); communicate with T. Moyron regarding same (.10); revise initial draft of WARN update for employees (.40); communicate with R. Adcock and P. Chadwick regarding WARN update letters for employees (.20); communications with J. Davis regarding updated notices for employees (.20); further communicate with H. Biehl-Levy, R. Adcock, and P. Chadwick regarding details of provision of information to Prime (.30); telephone call with P. Chadwick regarding same (.20); write draft communication for Prime with conditions for provision of employee information to Prime (.90); forward same to team with comments on same (.20); review further related responding communications (H. Biehl-Levy and J. Richlin) (.20); communications with A. Ruda regarding provision of union dues deductions to Prime (.40); review emails forwarded by M. Garms and others as related to Prime request for emails of employees not hired (.30).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	S. McCandless	3.90	3,116.10	EMP	Communicate with R. Adcock and team to provide initial results of IRS research as related to provision of tax-related employee data to Prime (.40); telephone call with T. Santoli to follow up regarding same (.20); provide related information to T. Santoli for analysis (.20); further related communications with T. Santoli and M. Maryn (.20); communicate with S. Maizel regarding conditions for provision of information to Prime and related telephone call with S. Maizel (.30); communicate with P. Stockburger regarding California privacy implications of provision of requested employee data to Prime (.20); review prior related correspondence and work with A. Youssefi on revisions to WARN update letters (.80); review Maizel and Moyron changes to same (.20); discuss provision of employee information to Prime with A. Youssefi in context of California privacy law (.20); further related research and telephone calls with A. Youssefi, P. Stockberger, and conference call with both to discuss employee California privacy matters and drafting and handling of notice to employees; (.80); team conference call to make decision on provision of employee payroll and tax information to Prime and conditions for same (.40).
08/12/20	S. McCandless	3.80	3,036.20	EMP	Revise first draft of employee privacy notice for anticipated data transfer to Prime (.70); telephone call with A. Youssefi to further revise and simplify notice (1.00) communicate with P. Stockburger regarding same (.30); discuss other matters related to transfer of data with A. Youssefi, including questions on format of same (.50); discuss union matters related to close of sale with A. Youssefi (.20); communicate with P. Chadwick regarding transfer of data (.20); forward privacy notice to clients with related instructions (.20); communicate with A. Ruda regarding union matters related to data transfer (.20); communicate with P. Chadwick regarding date transfer and posting of notice (.20); review various communications as related to request of J.



St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					Richlin regarding provision of information re employees to be hired by Rehab Alliance (.30).
08/12/20	A. Shiran	3.60	1,852.20	EMP	Draft government update for corporate VHS employees (.3); draft update notice for corporate VBS employees (.2) draft government update for hospital employees (.4); draft and revise privacy notice relating to CA data privacy laws (.8); discuss terms of privacy notice, transfer of employee information and related matters with S. McCandless (1.5); discuss union matters related to close of sale with S. McCandless (.2); correspondence regarding union related matters with A. Ruda (.2).
08/12/20	P.Z. Stockburger	0.20	126.65	EMP	Review and comment on proposed notice (.1); confer with S. McCandless regarding the same (.1).
08/13/20	S. McCandless	0.20	159.80	EMP	Communicate with P. Chadwick regarding posting of employee privacy notice.
08/18/20	T. Moyron	0.30	179.78	EMP	Analyze A. Ruda et al., correspondence re AG re Prime hired employees.
08/19/20	A. Shiran	0.20	102.90	EMP	Receipt and review of further inquiry regarding employee data from Prime and evaluate same.
08/19/20	S. McCandless	0.70	559.30	EMP	Review communications related to migration of emails to Prime (.50); communicate with H. Levy-Biehl regarding same (.20).
08/20/20	S. McCandless	3.20	2,556.80	EMP	Review communication from T. Moyron regarding Prime request for leave of absence data (.10); respond to same with various reasons to deny request (.70); communicate with T. Moyron and team regarding same (.10); further respond to client and team regarding same (.20); review and analyze APA for response to Prime request for email boxes of employees not hired (30); discuss analysis of applicable provisions with A. Youssefi and provide instructions for related research (.60); discuss results of research and language for response to J. Richlin with A. Youssefi (.60); draft and forward initial response to team with related questions on

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
					background information (.30); further communicate with H. Levy-Biehl, M. Garms, and T. Moyron regarding same (.30).
08/20/20	A. Shiran	3.80	1,955.10	EMP	Telephone conference with S. McCandless to discuss data transfer requests by Prime (.6); evaluate and analyze employee privacy rights in connection with data transfer request and APA provisions applicable to request for data and conduct research regarding same (2.3); further discuss with S. McCandless including case law and implications of privacy rights (.6) correspondence regarding same with bankruptcy and corporate teams (.3)
08/21/20	S. McCandless	0.70	559.30	EMP	Telephone call with R. Adcock, T. Moyron, and M. Garms to discuss response to request for emails of employees not hired (.30); review M. Garms proposed response to J. Richlin (.20); review T. Moyron's changes to same (.10); comment on same (.10).
08/21/20	A. Shiran	0.30	154.35	EMP	Telephone conference with bankruptcy and corporate team and client to confirm handling of employee data request (.2); review written response to Prime regarding data request (.1).
08/23/20	S. McCandless	0.20	159.80	EMP	Review Richlin response for Prime to M. Garms' communication in response to Prime request for emails of employees not hired.
08/24/20	S. McCandless	1.00	799.00	EMP	Review J. Richlin's detailed response as related to Prime request for emails of employees not hired (.60); review supporting documentation (.40).
08/24/20	A. Shiran	0.10	51.45	EMP	Evaluate further correspondence from J. Richlin regarding email accounts as purchased assets and request for migration of same.
08/25/20	A. Shiran	0.60	308.70	EMP	Receipt and review of correspondence from government workforce board (.1) review supporting backup data, analyze request, and prepare response to same (.5).

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/20	A. Shiran	0.30	154.35	EMP	Correspondence with Rich Adcock regarding government inquiry as to St. Francis WARN Notice (.1) prepare response to NOVA workforce board regarding St. Francis WARN inquiry (.2)
08/27/20	A. Shiran	0.30	154.35	EMP	Receipt and review of inquiry from Peter Chadwick regarding handling of temporary employees and prepare response to same.
08/27/20	S. McCandless	0.80	639.20	EMP	Review communication from T. Moyron regarding Prime's new request to HealthNow for health care provider information and related prior communications from HealthNow, Alliant, and P. Chadwick (.30); review communication from H. Levy-Biehl regarding Prime request for emails of employees not hired and status of migration of other emails (.20); related review of client policies forwarded by H. Levy-Biehl (.30).
08/27/20	S. Alberts	0.30	240.00	EMP	Communication concerning Prime and hiring of employees (.1) and review prior materials (.2).
08/28/20	T. Moyron	0.70	419.48	EMP	Call with R Adcock, H. Levy-Biehl, P. Chadwick re employee matters (.4); analyze related matters and H. Levy-Biehl correspondence (.3).
08/28/20	S. McCandless	0.80	639.20	EMP	Communicate with P. Chadwick regarding status of migration of emails for employees hired by Prime (.20); client and team conference call to discuss Prime request for emails of employees not hired in context of legal issues and related additional factual background (.50); follow up call with H. Levy-Biehl (.10).
08/28/20	S. Alberts	0.50	400.00	EMP	Review and respond to inquiry concerning Prime and offers to substantially all employees (.1), receive and respond to follow up (.1), receive materials concerning Prime's letter to state on offers and draft response (.3).
08/28/20	S. Maizel	0.50	400.00	EMP	Telephone conference with R. Adcock, BRG, etc. re emails of non-hired employees for Prime.

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/20	S. McCandless	0.40	319.60	EMP	Consider and prepare communication to T. Moyron regarding Prime request for information from HealthNow on health care providers to former Verity employees.
08/31/20	S. McCandless	1.20	958.80	EMP	Telephone call with J. Richlin and H. Levy-Biehl to discuss request for emails of employees not hired and legal issues posed by same (.50); review certain of prior correspondence to prepare for same (.30); prepare outline of notes for discussion in preparation for same (.40).
08/31/20	S. Alberts	0.30	240.00	EMP	Communications concerning State/Prime inquiry on employee hiring issues.
09/01/20	T. Moyron	0.50	299.63	EMP	Conference call regarding requests from Prime re employee claims (.3); analyze related emails (.2).
09/01/20	S. McCandless	2.60	2,077.40	EMP	Review various forwarded communications related to AG's request for information on commitment to offer employment to substantially all employees under APA (.60); client call with team to discuss and decide approach to same and to relay information learned regarding Prime's hiring (.60); communicate with S. Maizel regarding same (.30); review communication from H. Levy-Biehl (with related information) posing questions as to Prime request for information on health providers of Verity employees and individual health practitioners (.40); respond to same (.40); further communicate with H. Levy-Biehl as related to individual health care information and need for employee authorization (.30).
09/04/20	S. McCandless	0.20	159.80	EMP	Communicate with H. Levy-Biehl regarding migration of emails to Prime.
09/04/20	S. Alberts	0.10	80.00	EMP	Communication concerning Prime labor question.
<b>Subtotal</b>		<b>67.10</b>	<b>46,124.40</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K.M. Howard	0.20	50.15	MED.DHCS	Analysis of stipulation pertaining to the settlement agreement with DHHS regarding assumption and assignment of Medicare Provider Agreements to AHMC Healthcare and Prime Healthcare.
08/03/20	S. Maizel	0.30	240.00	MED.DHCS	Review and respond to emails re DHCS settlement.
08/04/20	S. Maizel	1.00	800.00	MED.DHCS	Attend to issues related to transfer of Medi-Cal provider agreement.
08/04/20	S. Maizel	0.10	80.00	MED.DHCS	Telephone conference with Ken Wang re DHCS settlement.
08/10/20	N. Koffroth	0.70	351.05	MED.DHCS	Draft stipulation and order resolving DHCS objection to transfer of Medi-Cal provider agreement
08/10/20	S. Maizel	0.30	240.00	MED.DHCS	Email to CMS counsel re DHS payments issues.
08/11/20	K.M. Howard	0.20	50.15	MED.DHCS	Analysis of order approving stipulation regarding the assumption and assignment of Medi-Cal Agreements to Prime Healthcare Services and reconciled same with Critical Dates Memorandum.
08/14/20	S. Maizel	0.30	240.00	MED.DHCS	Review and respond to emails re settlement with DHCS.
08/24/20	S. Maizel	0.20	160.00	MED.DHCS	Review and respond to emails from Ken Wang re SFMC - DHCS settlement (.1); telephone conference with N. Koffroth re same (.1).
08/28/20	S. Maizel	0.10	80.00	MED.DHCS	Review correspondence related to withdrawal of Medi-cal appeal and forward to Ken Wang.
<b>Subtotal</b>		<b>3.40</b>	<b>2,291.35</b>		

St. Francis Medical Center  
Matter: 15800425-000006  
Invoice No.: 2321659

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b>Task Code</b>	<b>Task Code Name</b>	<b>Fees</b>
AGI	Attorney General Issues	37,687.59
APP	Appellate Proceedings	75.23
B100	Administration	720.00
B110	Case Administration	630.45
B130	Asset Disposition	90,902.14
B140	Relief from Stay/Adequate Protection Proceedings	5,465.52
B185	Assumption/Rejection of Leases and Contracts	20,192.57
B190	Other Contested Matters (excl. assumption/rejection motions)	20,829.51
B210	Business Operations	409.05
B240	Tax Issues	3,114.69
B250	Real Estate	11,941.67
B300	Claims and Plan	1,581.44
B310	Claims Administration and Objections	1,728.09
B320	Plan and Disclosure Statement (incl. Business Plan)	749.29
EMP	Employee matters	46,124.40
MED/DHCS	Medi-Cal/DHCS Issues	2,291.35
Total This Matter		\$244,442.99

**TIME AND FEE SUMMARY**

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$800.00	16.10	\$12,880.00
S. Alberts	\$800.00	2.10	\$1,680.00
S. Maizel	\$800.00	25.30	\$20,240.00
S. Martin	\$760.75	9.40	\$7,151.06
M. Maryn	\$800.00	0.70	\$560.00
P.Z. Stockburger	\$633.25	1.10	\$696.58

Verity Health System of California, Inc.  
Invoice #: 2321659

September 30, 2020

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
R. Garms	\$603.50	34.70	\$20,941.45
R. Richards	\$723.00	14.10	\$10,194.30
R. Westhoff	\$468.00	7.10	\$3,322.80
S. Libowsky	\$800.00	0.60	\$480.00
S. McCandless	\$799.00	37.50	\$29,962.50
T. Moyron	\$599.25	54.30	\$32,539.39
T. Santoli	\$799.00	2.40	\$1,917.60
J.A. Moe, II	\$599.25	33.20	\$19,895.47
K. Murphy	\$416.50	28.10	\$11,703.65
M.L. Irel	\$510.00	8.20	\$4,182.00
R. Millner	\$800.00	0.20	\$160.00
M. Zeefe	\$480.25	1.60	\$768.40
A. Shiran	\$514.50	23.30	\$11,987.85
J. Whipple	\$527.00	0.40	\$210.80
N. Koffroth	\$501.50	36.30	\$18,204.45
N. Carson	\$412.25	8.60	\$3,545.40
A. Dondoyano	\$323.00	40.20	\$12,984.60
J. DiChiara	\$429.25	8.40	\$3,605.71
D. Pina	\$318.75	0.50	\$159.38
G. Medina	\$293.25	0.90	\$263.93
K.M. Howard	\$250.75	7.00	\$1,755.27
M.M. Welch	\$267.75	<u>46.50</u>	<u>\$12,450.40</u>
Totals		448.80	\$244,442.99

Fee Total \$ 244,442.99

Invoice Total \$ 244,442.99

DENTONS

Main Document

Page 236 of 328

SNR Denton US LLP  
1100 E. Coast Street  
Suite 2500  
Los Angeles, California 90017-5704

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321660**

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside

Payment Due Upon Receipt

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Total This Invoice	\$ 76,091.28
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

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Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300





Verity Health System of California, Inc.  
 2040 E. Mariposa Avenue  
 El Segundo, CA 90245  
 USA

September 30, 2020

**Invoice No. 2321660**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000008  
 Seton Medical Center and Seton Coastside

**AGI - Attorney General Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	S. Maizel	0.10	80.00	AGI	Telephone conference with T. Moyron, etc. re AG conditions issues.
08/03/20	S. Maizel	0.50	400.00	AGI	Telephone conference with AHMC counsel re AG Conditions issues.
	<b>Subtotal</b>	<b>0.60</b>	<b>480.00</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B120 - Asset Analysis and Recovery**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	T. Moyron	1.30	779.03	B120	Analyze and prepare document request (.9); analyze Bank of Hemet letter (.1); analyze updated version and comments (.3).
	<b>Subtotal</b>	<b>1.30</b>	<b>779.03</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
03/14/20	D.E. Fisher	3.80	1,711.90	B130	Take calls (.5); review and revise contract regarding COVID-19 (3.3).
03/15/20	D.E. Fisher	1.60	720.80	B130	Review of edited contract regarding COVID-19 space and operations at Seton Medical (1.2); participate in conference call regarding edits to same (.4).
03/16/20	D.E. Fisher	1.30	585.65	B130	Review of correspondence (.3); edits recommended to agreement with California (1.0).
08/02/20	T. Moyron	0.50	299.63	B130	Conference call with R. Adcock re open Seton matters (.4) and follow up call regarding same (.1).
08/03/20	T. Moyron	1.60	958.80	B130	AHMC operational call (.4); correspond with R. Adcock, et al. re AG conditions (.3); call with AHMC, H. Levy-Biehl and S. Maizel (.5); call with H. Levy-Biehl re same (.4).
08/03/20	S. Maizel	0.10	80.00	B130	Telephone conference with Eric Tuckman re sale closing issues.
08/03/20	R. Westhoff	0.20	93.60	B130	Review email from N. Nguyen re: completed 593-c forms (.1); review same (.1).
08/03/20	A. Dondoyano	0.80	258.40	B130	Facilitate and deliver items requested by the title company.
08/04/20	A. Dondoyano	1.90	613.70	B130	Draft various closing documents (1.0); Confer with title company re closing items (0.9);
08/05/20	S. Maizel	0.40	320.00	B130	Telephone conference with AHMC re closing issues.
08/05/20	A. Dondoyano	1.00	323.00	B130	Closing checklist call and revise closing checklist (0.4); Confer with title company and facilitate completion of outstanding items (0.2); Internal checklist call (0.4).
08/06/20	A. Dondoyano	1.50	484.50	B130	Revise AHMC drafts of various closing documents (1.1); Revise closing checklist and circulate the same to closing checklist call group (0.4).
08/06/20	C. Montgomery	0.10	80.00	B130	Phone call J Emerson re closing question.

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	R. Westhoff	0.10	46.80	B130	Review closing issues.
08/06/20	N. Koffroth	0.60	300.90	B130	Participate in closing checklist call
08/07/20	A. Dondoyano	3.50	1,130.50	B130	Closing checklist call and revise closing checklist (0.5); Internal checklist call (0.3); Draft various closing documents (2.7).
08/07/20	J.A. Moe, II	0.20	119.85	B130	/Seton APA Exhibit/ In regard to the sale of Seton, review Kathleen Conway 's E-Mail on updated List of potential claims against Seton, and setting conference on four claims (.10); telephone call to Karleen Murphy on updated List and creating new List (.10).
08/07/20	C. Montgomery	0.10	80.00	B130	Communications with D. Riley regarding closing date.
08/07/20	R. Westhoff	0.30	140.40	B130	Review issues re: Real Estate Assignment Agreements.
08/07/20	S. Maizel	0.10	80.00	B130	Telephone conference with BRG, etc. re closing checklist issues.
08/08/20	C. Montgomery	1.20	960.00	B130	Draft communications with D. Riley regarding delivery of PACE documentation and review execution version (.6); review draft Seton Closing statement (.6).
08/08/20	R. Westhoff	0.20	93.60	B130	Review updated closing statement.
08/09/20	C. Montgomery	0.20	160.00	B130	Communications with D Riley regarding PACE Bonds (.1); communications with T Moyron re closing issues (.1)
08/10/20	T. Moyron	0.40	239.70	B130	Analyze emails from Maan-Huei Hung re TSA (.1); analyze email from Maan-Huei Hung re certifications (.1); analyze correspondence related to AHMC's changes to DHCS settlement (.2).
08/10/20	T. Moyron	0.30	179.78	B130	Correspond with T. Conner, et al., re insurance matters and analyze related matters re APA.
08/10/20	T. Moyron	0.20	119.85	B130	Conference call with H. Kevane re resolution with SMHP (.1); analyze emails from AHMC counsel, et al. (.1).

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	C. Montgomery	1.00	800.00	B130	Review TSA services and agreement (.2); review Huntington Finance Payoff letter (.1); revise same (.2) ; communications with D Riley regarding Pace payoff(.3); communications with J Emerson M Welch regarding Huntington owned equipment (.2)
08/10/20	S. Maizel	0.40	320.00	B130	Telephone conference with AHMC re IMA issues.
08/10/20	A. Dondoyano	3.80	1,227.40	B130	Internal checklist call (0.5); Closing checklist call and revise closing checklist (1.5); Draft various closing documents and confer with title company re outstanding items (1.8).
08/10/20	J.A. Moe, II	0.40	239.70	B130	/Seton APA Exhibit/ In regard to the sale of Seton, review lengthy set of E-Mails related to sale of Seton and litigation reported to AHMC (.10); telephone calls with Elina Tilman and then with An Ruda, on Grievances (.20); E-Mails to Tania Moyron on response to Ms. Moyron's question (.10).
08/10/20	R. Garms	5.60	3,379.60	B130	Review and revise transition services agreement (1.5); review and revise closing documents (1.9); e-mails and calls regarding transaction (2.2).
08/11/20	R. Garms	5.10	3,077.85	B130	Work on transition services agreement (1.7); review and revise closing documents (1.5); e-mails and calls regarding closing (1.9).
08/11/20	A. Dondoyano	4.50	1,453.50	B130	Draft various closing documents and confer with title company re closing items.
08/11/20	C. Montgomery	0.30	240.00	B130	Review escrow agreement for AHMC indemnity (.2); communications with D Riley regarding PACE Release (.1)
08/11/20	J.A. Moe, II	1.10	659.18	B130	/Seton APA Exhibit/ In regard to the sale of Seton, review compilation of updated list of claims and litigation, for updated Exhibit (.10); telephone call to Karleen Murphy discussing necessity to complete the updated Exhibit on the sale of Seton, then telephone call to Kathleen Conway on conference call (.20); telephone call to Ms. Conway and Ms. Murphy and E-Mail on call (10); telephone call with Kathleen Conway

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
					and Karleen Murphy reviewing new cases for Exhibit for sale of Seton (.30); telephone call with Karleen Murphy on updated Exhibit (.10); telephone call with Ah Ruda on resolution of all but one Labor Grievance (.10); telephone call returned to Karleen Murphy on resolution of Labor Greivances (.10); review completed Exhibit, telephone call to Ms. Murphy, and transmit Exhibit to Tania Moyron and Adam Dondoyano (10).
08/11/20	K. Murphy	0.80	333.20	B130	/ Seton APA Exhibit / Telephone call with John Moe re update to exhibit (.1); telephone call with John Moe and Kathleen Conway re new matters on Loss Run Report (.2); prepare further updates to exhibit (.4); draft email to Elina Tilman confirming status of Bonificio matter as Labor Code Request only (.1).
08/11/20	J. DiChiara	2.70	1,158.98	B130	Compile signature pages and update closing checklist (2.5); confer with A. Dondoyano regarding the same (.2).
08/11/20	T. Moyron	0.20	119.85	B130	Conference call with AHMC, N. Nguyen, BRG, et al. re closing.
08/11/20	R. Westhoff	0.60	280.80	B130	Review draft closing instruction letter (.2); review status of deeds and owner's affidavits (.2); review issues re: pending construction projects (.1); review closing status (.1).
08/11/20	S. Maizel	0.30	240.00	B130	Telephone conference with AHMC re closing checklist issues.
08/12/20	J.A. Moe, II	0.10	59.93	B130	Exchange E-Mails with Adam Dondoyano on transmittal and receipt of updated Exhibit on litigation and "claims" asserted against St. Francis to be delivered to AHMC as the purchaser of St. Francis.
08/12/20	T. Moyron	1.10	659.18	B130	Conference call with T. Conner, et al. re APA Section 4.10 and related insurance matters (.5); conference call with AHMC, et al. re APA Section 4.1 (.3); analyze T. Conner, et al. emails re (.3).

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	R. Westhoff	0.90	421.20	B130	Review issues re: deed cover page requested by title company (.2); review issues re: transfer tax calculations (.3); review emails from L. Kmiec re: same (.2); review issues re: tax lien indemnity (.2).
08/12/20	A. Dondoyano	5.90	1,905.70	B130	Draft various closing documents and confer with title company re closing items to facilitate closing.
08/12/20	C. Montgomery	0.40	320.00	B130	Communications with D Riley, P Chadwick and J schlant re Seton closing statement (.3); review same (.1).
08/12/20	R. Garms	3.40	2,051.90	B130	Revise transition services agreement (2.8); e-mails and calls regarding closing (0.6).
08/13/20	R. Garms	5.30	3,198.55	B130	E-mails and calls regarding closing (2.0); work on closing documents (3.1).
08/13/20	M. Zeefe	1.00	480.25	B130	Draft notice of Seton sale closing (0.9); emails with H. Kevane and T. Moyron re same (0.1).
08/13/20	C. Montgomery	0.70	560.00	B130	Communications with T Moyron, M Garms regarding closing issues (.2); review SMC-AHMC closing statement detail and participate in closing review call (.5)
08/13/20	A. Dondoyano	5.10	1,647.30	B130	Draft various closing documents and confer with title company re closing items to facilitate closing.
08/13/20	T. Moyron	3.30	1,977.53	B130	Conference calls with R. Adcock (.1), (.1), conference calls with J. Schlant (.1), (.1); conference call with P. Chadwick (.1), (.1); conference call with AHMC, BRG, (.3); analyze issues related to SmithGroup stipulation, cure and related matters (.4); analyze closing statements and updated statements (.4); analyze AHMC, BRG ,correspondence, et al. (.3); analyze updated TSA and exhibits (.4); analyze P. Chadwick emails re same (.3); analyze Chicago Title correspondence (.2); prepare same (.1); analyze correspondence from AHMC, et al. regarding closing documents and signatures (.3).
08/13/20	R. Westhoff	0.30	140.40	B130	Review real estate issues for closing.

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	T. Moyron	0.90	539.33	B130	Analyze AHMC emails, updated TSA and exhibits (.3); prepare correspondence regarding same (.2); analyze P. Chadwick, et al., emails (.2); conference call with R. Adcock re discussion with AHMC re TSA (.2).
08/13/20	T. Moyron	1.10	659.18	B130	Conference call with M. Garms re TSA, AHMC and closing (.3); call with R. Adcock re same (.2); follow up calls with R. Adcock (.2); analyze additional emails from AHMC re Final TSA and exhibits (.2); analyze follow up emails from P. Chadwick, R. Adcock, et al. re agreement on finalized TSA (.2).
08/13/20	R. Richards	0.20	144.60	B130	Emails re finalizing Sunquest stipulation.
08/13/20	S. Maizel	1.00	800.00	B130	Multiple telephone conference with AHMC representatives re closing issues.
08/14/20	A. Dondoyano	3.90	1,259.70	B130	Finalize and compile closing documents (3.4); Confer with title company re outstanding items (0.5).
08/14/20	T. Moyron	0.50	299.63	B130	Call with Chicago Title re executed versions of closing statement (.1); analyze AHMC, BRG correspondence re PTO (.2); analyze Chicago Title, et al., emails re release of funds, etc. (.2).
08/14/20	C. Montgomery	0.10	80.00	B130	Communications with D Riley
08/14/20	D. Pina	0.20	63.75	B130	Assist G. Medina with preparation and formatting of Notice of Seton Closing for electronic filing.
08/14/20	R. Garms	1.30	784.55	B130	E-mails regarding closing.
08/17/20	R. Garms	0.90	543.15	B130	Respond to questions regarding interim management agreement and sale leaseback agreement (0.4); review relevant agreements in connection therewith (0.5).
08/17/20	R. Richards	0.20	144.60	B130	Emails re finalizing Sunguard equipment stipulation.
08/17/20	A. Dondoyano	3.50	1,130.50	B130	Finalize and compile closing documents.
08/18/20	R. Garms	0.70	422.45	B130	Review purchase agreement and related documents and respond to questions regarding funding requirements.



September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	A. Dondoyano	0.30	96.90	B130	Confer with BRG and Dentons team re UCC payoff letters.
	<b>Subtotal</b>	<b>84.60</b>	<b>41,101.70</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/20	R. Richards	0.20	144.60	B185	Review list of contracts to be rejected.
08/05/20	K.M. Howard	0.10	25.08	B185	Analysis of the order approving Stipulation between Seton and United Healthcare regarding cure objection to ascertain related deadlines set by the court.
08/05/20	K.M. Howard	0.40	100.30	B185	Analysis of stipulation continuing objection deadlines for Health Plan of San Mateo concerning Cure Amounts and reviewed and revised Critical Dates Memorandum
08/07/20	K.M. Howard	0.20	50.15	B185	Analysis of order granting Debtors' omnibus motion to reject collective bargaining agreements to determine any additional deadlines set by the court.
08/07/20	K.M. Howard	0.40	100.30	B185	Analysis of order and stipulation continuing HPSM renewed objection deadline regarding cure amounts and reviewed and revised Critical Dates Memorandum.
08/07/20	K.M. Howard	0.20	50.15	B185	Analysis of order approving stipulation between Seton Medical Center and Health Net regarding cure objections to determine additional deadlines set by the court.
08/07/20	K.M. Howard	0.20	50.15	B185	Analysis of Stipulation between Seton Medical Center and Kaiser regarding cure objection and reconciled with Critical Dates Memorandum.
08/07/20	N. Koffroth	0.70	351.05	B185	Draft stipulations and orders continuing renewed cure objection deadlines for (i) Kaiser Foundation (0.3) and (ii) Health Plan of San Mateo (0.4)
08/08/20	N. Koffroth	0.40	200.60	B185	Participate in internal call re UnitedHealthcare objection
08/10/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Seventh Omnibus Motion to Reject, Payor, Administrative and Risk-Sharing Agreements and Order setting the hearing and reviewed and revised Critical Dates Memorandum.

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	K.M. Howard	0.40	100.30	B185	Analysis of stipulation continuing reply deadline to AppleCare's Confirmation Objection and reviewed and revised Critical Dates Memorandum.
08/10/20	K.M. Howard	0.10	25.08	B185	Analysis of order approving stipulation between Debtors and Kaiser resolving cure objection issues to determine additional requirements set by the court.
08/10/20	K.M. Howard	0.40	100.30	B185	Analysis of order approving second stipulation continuing Health Plan of San Mateo cure objection deadline and reviewed and revised Critical Dates Memorandum.
08/10/20	K.M. Howard	0.20	50.15	B185	Analysis of stipulation between Seton Medical Center and HPSM regarding cure objection to determine and reconciled same with Critical Dates Memorandum.
08/10/20	N. Koffroth	0.20	100.30	B185	Draft order approving stipulation resolving Health Plan of San Mateo cure objection
08/11/20	K.M. Howard	0.20	50.15	B185	Analysis of order approving stipulation between Seton Medical Center and HPSM regarding cure objections to determine additional requirements set by the Court.
08/11/20	K.M. Howard	0.10	25.08	B185	Analysis of stipulation between Seton Medical and Cigna Entities regarding cure objections.
08/11/20	K.M. Howard	0.10	25.08	B185	Analysis of order approving stipulation between Seton Medical and Cigna Entities regarding the cure objection to determine additional requirements added by the court.
08/12/20	K.M. Howard	0.40	100.30	B185	Analysis of the order granting stipulation for rejection of Hospital Services Agreement with Aetna Life Insurance Company and reviewed and revised the Critical Dates Memorandum.
08/13/20	N. Koffroth	0.80	401.20	B185	Draft stipulation and order re SmithGroup assumption stipulation
08/14/20	N. Koffroth	0.40	200.60	B185	Draft SmithGroup assumption stipulation and order

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/17/20	N. Koffroth	0.70	351.05	B185	Draft stipulations and orders concerning Sunquest abandonment (0.3); Blue Shield cure resolution (0.4)
08/17/20	J.A. Moe, II	0.20	119.85	B185	Review Final Notice of Executory Contracts and Leases Being Assumed by AHMC, including review of rejection of contract with Alcon Vision (.10); telephone call to Abigail Robles' office on reconciliation of the consigned product (.10).
08/18/20	N. Koffroth	0.20	100.30	B185	Draft SmithGroup assumption stipulation and order
08/18/20	K.M. Howard	0.20	50.15	B185	Analysis of Order Approving Stipulation Between Seton Medical Center And California Physicians' Service, dba Blue Shield Of California Regarding Cure Objection to determine additional deadlines or requirements set by the court.
08/18/20	K.M. Howard	0.20	50.15	B185	Analysis of Order Approving Stipulation Regarding Abandonment Of Computer Hardware Equipment To Sunquest Information Systems, Inc. to determine additional deadlines or requirements set by the court.
08/19/20	K.M. Howard	0.40	100.30	B185	Analysis of the Order granting Debtors' Sixth Omnibus Motion to Reject Certain Executory Contracts and Unexpired Leases and reviewed and revised Critical Dates Memorandum.
08/21/20	G. Medina	0.70	205.28	B185	Communication with N. Koffroth re filing (0.1) review filed Stipulation By Verity Health System of California, Inc. and Smithgroup, Inc., Modifying Final Designation Notice Regarding Seton Sale To Reflect Assumption of Agreement (0.3) Upload order and send efiled copy to N. Koffroth and team (0.3).
08/21/20	K.M. Howard	0.20	50.15	B185	Analysis of stipulation modifying final designation notice regarding payment of cure amount to SmithGroup and noted timing of payment after issuance of order approving stipulation.

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	K.M. Howard	0.40	100.30	B185	Analysis of order approving stipulation regarding the cure amount AHMC owes to the Smith Group and reviewed and revised Critical Dates Memorandum.
08/25/20	K.M. Howard	0.40	100.30	B185	Analysis of Debtors' Notice and Eighth Omnibus Motion to Reject certain Rental Contracts and Equipment Leases and reviewed and revised Critical Dates Memorandum.
<b>Subtotal</b>		<b>10.10</b>	<b>3,579.05</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K. Murphy	0.10	41.65	B190	/ Castro / Prepare update to Verity Litigation Chart to reflect defense litigation counsel assignment to post petition matter.
08/05/20	K. Murphy	0.10	41.65	B190	/ Sanchez / Analyze case update email from Karen Chapman.
08/11/20	K.M. Howard	0.30	75.23	B190	Analysis of stipulation between Verity Health and Aetna Life Insurance Company noting that entry of the order approving stipulation will trigger certain deadlines.
08/13/20	K. Murphy	0.40	166.60	B190	/ Rogheih / Analyze case description and notes from call with Kathleen Conway re case facts (.1); and prepare updates to all Verity Charts re new matter (.3).
08/13/20	K. Murphy	0.30	124.95	B190	/ Rodriguez, Henry / Analyze case description and notes from call with Kathleen Conway re case facts (.1); and prepare updates to all Verity Charts re new matter (.2).
08/13/20	K. Murphy	0.20	83.30	B190	/ Tandon / Analyze case description and notes from call with Kathleen Conway re case facts (.1); and prepare updates to all Verity Charts re updated case information (.1).
08/13/20	K. Murphy	0.20	83.30	B190	/ Yu / Analyze case description and notes from call with Kathleen Conway re case facts (.1); and prepare updates to all Verity Charts re new case information (.1).
08/19/20	J.A. Moe, II	0.20	119.85	B190	/Ondina Castro v. Seton/ Review Superior Court Counsel Cyrus Tabari's review of the background and analysis of the merits of the case.
08/19/20	K. Murphy	0.10	41.65	B190	/Castro/ Analyze case update from litigation counsel.
08/25/20	K.M. Howard	0.30	75.23	B190	Analysis of Seton's Complaint against Anesthesia Care Consultants.
09/01/20	J.A. Moe, II	0.10	59.93	B190	/Antonio Sanchez v. Seton/ Review Hope Levy Biehl's E-Mail, review assertion in Mr. Sanchez' attorney's letter, and E-Mail to Karleen Murphy.

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	K.M. Howard	0.40	100.30	B190	Reviewed letter of intent in Sanchez v. Seton and reviewed and revised Litigation Management Chart.
09/02/20	J.A. Moe, II	0.10	59.93	B190	/Antonio Sanchez v. Seton/ Review lengthy thread of multiple E-Mails on current status of and continuing litigating involving Cyrus Tabari's defense to Seton.
<b>Subtotal</b>		<b>2.80</b>	<b>1,073.57</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B210 - Business Operations**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	R. Richards	0.80	578.40	B210	Review Sunguard prior pleadings and claim (0.3); prepare stipulation to abandon computer hardware equipment to Sunguard (0.4): emails re same (0.1).
08/10/20	J.A. Moe, II	0.20	119.85	B210	In regard to the sale of Seton and reconciling amount of inventory held by Seton for Alcon Vision, telephone call returned from Abigail Robles on contact with Alcon Vision on conducting joint inventory.
08/14/20	J.A. Moe, II	0.10	59.93	B210	Telephone call to Abigail Robles on reconciliation of consigned product with Alcon Vision.
08/18/20	J.A. Moe, II	0.10	59.93	B210	In regard to completing an inventory of Alcon Vision's consigned products, telephone calls to Abigail Robles to both her cell phone and office.
	<b>Subtotal</b>	<b>1.20</b>	<b>818.11</b>		



September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B220 - Employee Benefits/Pension**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	K.M. Howard	0.10	25.08	B220	Analysis of the order granting Debtors' Motion to Reject Trust Agreement for the Retirement Plan for Hospital Employees to determine any additional requirements added by the court.
08/12/20	K.M. Howard	0.10	25.08	B220	Analysis of order granting Debtors' Motion to Reject Local 39 Pension and Trust Agreement to determine any additional requirements set by the court.
	<b>Subtotal</b>	<b>0.20</b>	<b>50.16</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**B300 - Claims and Plan**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	J.A. Moe, II	0.30	179.78	B300	In regard to the review of Administrative Claims in connection with the Plan, telephone call to Smith & Nephew's counsel on withdrawal of claim (.10); review Jon Schlant's E-Mail on contact with Smith & Nephew and confer with Jon Emerson on satisfaction of Claim, and telephone call with Tania Moyron on resolution of Claim (.20).
	<b>Subtotal</b>	<b>0.30</b>	<b>179.78</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**EMP - Employee matters**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	C. Doherty, Jr.	0.20	74.80	EMP	Review Ruling and prepare Order in accordance with Ruling for 1113 Motion
08/05/20	C. Doherty, Jr.	1.50	561.00	EMP	Prepare Notice of complete settlement agreements (1.0); prepare Order re 1113 agreements (.5)
08/06/20	C. Doherty, Jr.	0.50	187.00	EMP	Draft emails re 1113 Order and Notice (.3); review drafts of same (.2)
08/07/20	C. Doherty, Jr.	0.20	74.80	EMP	Draft and attention to emails re 1113 Settlements
08/07/20	S. McCandless	0.80	639.20	EMP	Discuss time line for employee separations with A. Youssefi in context of pending sale (.20); review AHMC request for employee compensation information and related communications (.40); consider and respond to same (.20).
08/07/20	A. Shiran	1.10	565.95	EMP	Evaluate further employee correspondence (.9); discuss same with S. McCandless (.2)
08/11/20	S. Maizel	0.30	240.00	EMP	Review and revise WARN Notice.
08/11/20	S. McCandless	2.60	2,077.40	EMP	Consider and prepare communication to R. Adcock and team regarding handling of employee separations in context of anticipated closure and possible delay of a few days (.50) (split with St. Francis); communicate with T. Moyron regarding same (.10); revise initial draft of WARN update for employees (.40); communicate with R. Adcock and P. Chadwick regarding WARN update for employees (.20); communications with J. Davis regarding updated notices for employees (.20); review prior related letters and work with A. Youssefi on WARN update letters (1.00); review Maizel and Moyron changes to same and incorporate same (.20).

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	A. Shiran	3.40	1,749.30	EMP	Draft hospital employee WARN update (.6); draft four separate Union WARN update letters to union representatives (1.2); discuss language for employee communications with S. McCandless (1.1); review and incorporate bankruptcy team comments (.3); numerous correspondence with client regarding employee correspondence (.2)
08/12/20	S. McCandless	0.90	719.10	EMP	Communicate with P. Chadwick regarding data questions as related to Seton employees (.30); communicate with T. Moyron regarding same (.30); review follow up communications re employee notices (government and client communications) (.30).
08/12/20	A. Shiran	1.00	514.50	EMP	Draft government update regarding corporate employee terminations (.3); draft government update for hospital employees (.5); correspondence with client regarding same (.2).
<b>Subtotal</b>		<b>12.50</b>	<b>7,403.05</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**INS - Insurance**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/07/20	R. Richards	0.70	506.10	INS	Analysis re insurance representation and emails re same.
08/10/20	R. Millner	0.30	240.00	INS	Review Seton APA and leaseback insurance provisions.
08/10/20	R. Richards	0.60	433.80	INS	Work on insurance issue (0.5), discuss with AHMC counsel (0.1).
08/10/20	T. Moyron	0.40	239.70	INS	Analyze insurance issues re APA, IMA, SLA.
08/10/20	S. Walker	2.00	1,600.00	INS	Analyze final Seton asset purchase agreement and insurance obligations and emails from R. Millner, R. Richards, T. Moyron.
08/11/20	S. Walker	0.50	400.00	INS	Teleconference, R. Richards and M. Garms regarding insurance renewal issues for Seton Agreement.
08/11/20	S. Walker	0.40	320.00	INS	Analyze emails from R. Richards, M. Garms and Tania M. Moyron regarding insurance issues.
08/11/20	S. Walker	1.10	880.00	INS	Analyze Interim Management Agreement and Sale/Leaseback Agreement regarding insurance coverage issues.
08/11/20	S. Walker	0.40	320.00	INS	Analyze Reinsurance Renewal Binders - All Layers and schedule of Seton's insurance.
08/11/20	S. Walker	1.00	800.00	INS	Analyze post-closing insurance needs.
08/11/20	R. Richards	3.70	2,675.10	INS	Review insurance related provisions in Seton documents and disclosure schedules (1.4); calls with Susan Walker and Matt Garms of Dentons (0.5); Ty Connor of Verity (0.2), David Galfus of BRG (0.2) and Rich Adcock and the Verity team (0.3) re same; call with buyer's counsel and client re Seton insurance (0.3); review and send follow up materials to buyer's counsel (0.8).
08/11/20	T. Moyron	1.10	659.18	INS	Analyze T. Conner, et al. correspondence and attachment re insurance (.3); conference call with AHMC, T. Conner, et al. (.4); conference call with R. Adcock, et al. re insurance matters (.4).

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside  
Invoice No.: 2321660

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	S. Walker	0.40	320.00	INS	Analyze multiple emails from T. Connor, R. Richards, M. Egan, T. Connor re insurance dispute and potential tail coverage.
08/12/20	S. Walker	0.10	80.00	INS	Analyze emails from T. Moyron re resolution of insurance dispute.
08/12/20	S. Walker	0.10	80.00	INS	Analyze email R. Richards re proposed response to buyers re insurance dispute.
08/12/20	R. Richards	3.10	2,241.30	INS	Additional emails and analysis re insurance issue (1.2); internal call re insurance issue (0.3); call with buyer re insurance issue (0.3); draft formal response email for same (0.3); emails re resolution of issue (0.1); call with Jon Emerson on contracts and leases to be rejected (0.2); update Dentons LA re same (0.1); work on motion to reject (0.6).
<b>Subtotal</b>		<b>15.90</b>	<b>11,795.18</b>		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastsides  
Invoice No.: 2321660

**MED/DHC- Medi-Cal/DHCS Issues**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	S. Maizel	1.00	800.00	MED/DHCS	Attend to issues related to the transfer of the Medi-Cal provider agreement.
08/05/20	S. Maizel	1.00	800.00	MED/DHCS	Revising and forwarding DHCS settlement agreement.
08/06/20	S. Maizel	0.10	80.00	MED/DHCS	Telephone conference with Ken Wang re DHCS settlement.
08/10/20	S. Maizel	1.00	800.00	MED/DHCS	Review and revise DHCS settlement agreement (.8); review and respond to emails re same (.2).
08/11/20	S. Maizel	0.20	160.00	MED/DHCS	Telephone conference with Ken Wang (x2) re DHCS settlement.
08/11/20	S. Maizel	0.10	80.00	MED/DHCS	Telephone conference with Maanhuei H. re execution of DHCS settlement.
08/11/20	S. Maizel	0.50	400.00	MED/DHCS	Review and revise DHCS settlement agreement.
08/11/20	S. Maizel	1.40	1,120.00	MED/DHCS	Review and respond to emails re DHCS settlement, including revising agreement itself.
08/12/20	S. Maizel	0.30	240.00	MED/DHCS	Review and respond to emails re DHCS settlement (.2); telephone conference with Ken Wang re same (.1).
08/13/20	N. Koffroth	1.10	551.65	MED/DHCS	Draft stipulation and order approving settlement with DHCS re transfer of Medi-Cal provider agreement
08/13/20	S. Maizel	1.00	800.00	MED/DHCS	Multiple phone calls with Ken Wang, T. Moyron, etc. re DHCS settlement issues (.5); review and respond to emails re same (.3); review notices re filing of DHCS signature, etc. (.2).
	Subtotal	7.70	5,831.65		

September 30, 2020

Matter: 15800425-000008  
Seton Medical Center and Seton Coastside  
Invoice No.: 2321660

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
AGI	Attorney General Issues	480.00
B120	Asset Analysis and Recovery	779.03
B130	Asset Disposition	44,101.70
B185	Assumption/Rejection of Leases and Contracts	3,579.05
B190	Other Contested Matters (excl. assumption/rejection motions)	1,073.57
B210	Business Operations	818.11
B220	Employee Benefits/Pension	50.16
B300	Claims and Plan	179.78
EMP	Employee matters	7,403.05
INS	Insurance	11,795.18
MED/DHCS	Medi-Cal/DHCS Issues	5,831.65
Total This Matter		\$76,091.28

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	4.10	\$3,280.00
S. Maizel	\$800.00	9.80	\$7,840.00
R. Garms	\$603.50	22.30	\$13,458.05
R. Richards	\$723.00	9.50	\$6,868.50
R. Westhoff	\$468.00	2.60	\$1,216.80
S. McCandless	\$799.00	4.30	\$3,435.70
S. Walker	\$800.00	6.00	\$4,800.00
T. Moyron	\$599.25	12.90	\$7,730.37
J.A. Moe, II	\$599.25	3.10	\$1,857.71
K. Murphy	\$416.50	2.20	\$916.30
R. Millner	\$800.00	0.30	\$240.00
M. Zeefe	\$480.25	1.00	\$480.25



Verity Health System of California, Inc. September 30, 2020  
Invoice #: 2321660

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
D.E. Fisher	\$450.50	6.70	\$3,018.35
A. Shiran	\$514.50	5.50	\$2,829.75
C. Doherty, Jr.	\$374.00	2.40	\$897.60
N. Koffroth	\$501.50	5.10	\$2,557.65
A. Dondoyano	\$323.00	35.70	\$11,531.10
J. DiChiara	\$429.25	2.70	\$1,158.98
D. Pina	\$318.75	0.20	\$63.75
G. Medina	\$293.25	0.70	\$205.28
K.M. Howard	\$250.75	<u>6.80</u>	<u>\$1,705.14</u>
Totals		143.90	\$76,091.28

Fee Total	\$ 76,091.28
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Invoice Total	<u>\$ 76,091.28</u>
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**Invoice No. 2321662**

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For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000010  
Verity Medical Foundation

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/20	P. Maxcy	0.20	147.90	B130	Conference N. Haslun re SVMD payments.
	<b>Subtotal</b>	<b>0.20</b>	<b>147.90</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2321662

September 30, 2020

**B185 - Assumption/Rejection of Leases and Contracts**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/20	T. Moyron	0.20	119.85	B185	Analyze N. Haslun et al., emails.
08/18/20	P. Maxcy	0.50	369.75	B185	Review B. Ngo request and emails to N. Haslun re: information on rejected contracts.
08/19/20	P. Maxcy	1.20	887.40	B185	Review information on All Care contracts and analysis of ability to reject.
	<b>Subtotal</b>	<b>1.90</b>	<b>1,377.00</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2321662

September 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K. Murphy	0.20	83.30	B190	/ Valeria Revullo Angulo/ Analyze email from Elina Tilman enclosing AIG coverage letter and analyze letter (.1); and prepare update to Verity Litigation Chart re same (.1).
08/04/20	K. Murphy	0.30	124.95	B190	/ Valeria Revullo Angulo/ Analyze and respond to email from Nam Nguyen re Department of Labor Claim (.1); and prepared further Verity Chart updates re same (.2).
08/10/20	J.A. Moe, II	0.10	59.93	B190	/Sophia Santiago v. Verity Medical Foundation/ Review E-Mail from and telephone call with Elina Tilman on dismissal.
08/14/20	K. Murphy	0.20	83.30	B190	/ Santiago/ Analyze email from Elina Tilman advising of DLSE case closure (.1); and prepare updates to Verity Charts (.1).
08/18/20	J.A. Moe, II	0.10	59.93	B190	/Sofia Santiago v. Verity Medical/ Review E-Mails from Karleen Murphy and Elina Tilman on dismissal of DLSE Complaint, and revising Chart on Claims/Litigation.
08/31/20	K. Murphy	0.30	124.95	B190	/ CT Corporation-Walker/ Analyze and respond to email from Karen Chapman re clarification for treatment facility at issue (.1); telephone call and draft email to party serving subpoena to see clarification re same (.1); and telephone call to John Moe re VMF. (.1).
09/01/20	K. Murphy	0.20	83.30	B190	/ CT Corporation-Walker/ Receive telephone call and email from party serving subpoena to VMF re clarification of facility at issue (.1); and draft follow up email to Karen Chapman re the same (.1).
09/04/20	K. Murphy	0.10	41.65	B190	/ HEP Board of Pharmacy / Draft email to litigation counsel for VMF to determine results of OSC re dismissal/settlement on 9/3/20.
<b>Subtotal</b>		<b>1.50</b>	<b>661.31</b>		

Verity Medical Foundation  
Matter: 15800425-000010  
Invoice No.: 2321662

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	147.90
B185	Assumption/Rejection of Leases and Contracts	1,377.00
B190	Other Contested Matters (excl. assumption/rejection motions)	661.31
Total This Matter		\$2,186.21

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
P. Maxcy	\$739.50	1.90	\$1,405.05
T. Moyron	\$599.25	0.20	\$119.85
J.A. Moe, II	\$599.25	0.20	\$119.86
K. Murphy	\$416.50	<u>1.30</u>	<u>\$541.45</u>
Totals		3.60	\$2,186.21
Fee Total		\$ 2,186.21	
Invoice Total		<u>\$ 2,186.21</u>	

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**Invoice No. 2321666**

Matter: 15800425-000019  
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For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000019  
Verity Holdings, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	C. Montgomery	3.90	3,120.00	B130	Phone call to P Saba regarding master lease settlement resolution and bills of sale (.2); communications with T Moyron re same (.2); draft settlement order (.1); drafting bill of sale, proposed order and addendums (2.0); communications with J Schlant and J Emerson re same (.1) ; compare BRG spreadsheet with Master-lease addendum A (.5); phone call with J Schlant re same (.2); follow up communications with P Saba regarding Holdings to SVMC Bill of Sale and revise same (.6).
08/11/20	C. Montgomery	0.30	240.00	B130	Communications with P Saba regarding Master lease issues (.1); revise SVMC bill of sale (.2)
08/12/20	C. Montgomery	0.20	160.00	B130	Communications with P Saba regarding master lease documentation.
08/13/20	C. Montgomery	4.40	3,520.00	B130	Multiple phone calls with J Emerson and J Schlant regarding Master Lease addendum to bills of sale (1.1); multiple phone calls with P Saba re Same (.3); detailed review of exhibit lists and spread sheets for details of bill of sale and discrepancy review (2.5); communications with I Ortiz re exhibit compilation and comparison (.5);



Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2321666

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	C. Montgomery	1.30	1,040.00	B130	Communications with P Saba re Master Lease closing (.4) ; communications with I Ortiz re same (.1) phone call with J Emerson re closing (.1); phone call with M Garms regarding prior bill of sale (.1) ; follow up communications and phone calls with P Saba (.1) ; attention to execution documentation (.5)
08/19/20	C. Montgomery	0.10	80.00	B130	Communications with J Emerson and R Dino regarding Master Lease wire funding.
08/19/20	C. Montgomery	0.30	240.00	B130	Communications with P Saba, P Chadwick and J Emerson regarding Master Lease closing payments.
08/20/20	C. Keyser	0.50	174.25	B130	Research statutory requirements for dissolution.
08/21/20	C. Montgomery	0.60	480.00	B130	Phone calls with P Saba regarding closing payments (.2); communications with P Chadwick and P Saba re same (.4)
08/24/20	C. Montgomery	2.00	1,600.00	B130	Communications with T Moyron and P Chadwick regarding Master Lease bill of sale issues (.8); participate in phone conference with R Adcock, P Chadwick T Moyron re same (.4); phone calls with J Emerson re same (.3); updated communications with T Moyron re Jones Day letter re same (.5)
08/25/20	C. Montgomery	0.20	160.00	B130	Phone call with T Moyron regarding Master Lease resolution.
08/26/20	C. Montgomery	0.10	80.00	B130	Communications with B Rosenblum and P Chadwick regarding wire transfer receipt.
08/31/20	K.M. Howard	0.40	100.30	B130	Email exchange with R. Garms regarding additional corporate documents for Verity Holding LLC (.1); reviewed corporate in Cain Brothers Database and assembled requested documents (.3).
08/31/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/01/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/02/20	C. Keyser	0.30	104.55	B130	Work on dissolution.
09/03/20	C. Keyser	1.00	348.50	B130	Work on dissolution.
09/04/20	C. Keyser	0.50	174.25	B130	Work on dissolution.

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2321666

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
	<b>Subtotal</b>	<b>17.10</b>	<b>11,970.35</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2321666

September 30, 2020

**B310 - Claims Administration and Objections**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	J.A. Moe, II	0.10	59.93	B310	Review Omnibus Objection to Claims related to BASM.
08/29/20	J.A. Moe, II	0.10	59.93	B310	Review Order Sustaining First Omnibus Objection To BASM Guaranty Related Claims And Any Ballots Cast ByThe Holders Thereof.
<b>Subtotal</b>		<b>0.20</b>	<b>119.86</b>		

Verity Holdings, LLC  
Matter: 15800425-000019  
Invoice No.: 2321666

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	11,970.35
B310	Claims Administration and Objections	119.86
	Total This Matter	\$12,090.21

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	13.40	\$10,720.00
J.A. Moe, II	\$599.25	0.20	\$119.86
C. Keyser	\$348.50	3.30	\$1,150.05
K.M. Howard	\$250.75	<u>0.40</u>	<u>\$100.30</u>
Totals		17.30	\$12,090.21
Fee Total	\$	12,090.21	
Invoice Total	\$	<u>12,090.21</u>	

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**Invoice No. 2321663**

Matter: 15800425-000011  
De Paul Ventures, LLC

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**Invoice No. 2321663**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000011  
De Paul Ventures, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	C. Keyser	0.50	174.25	B130	Research statutory requirements for dissolution.
08/31/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
08/31/20	K.M. Howard	0.40	100.30	B130	Email exchange with R. Garms regarding additional corporate documents for DePaul Ventures (.1); reviewed corporate documents in Cain Brothers Database and assembled requested documents (.3).
09/01/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/02/20	C. Keyser	0.30	104.55	B130	Work on dissolution.
09/03/20	C. Keyser	1.00	348.50	B130	Work on dissolution.
09/04/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
	<b>Subtotal</b>	<b>3.70</b>	<b>1,250.35</b>		

De Paul Ventures, LLC  
Matter: 15800425-000011  
Invoice No.: 2321663

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	1,250.35
	Total This Matter	\$1,250.35

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Keyser	\$348.50	3.30	\$1,150.05
K.M. Howard	\$250.75	<u>0.40</u>	<u>\$100.30</u>
Totals		3.70	\$1,250.35
Fee Total	\$	1,250.35	
Invoice Total	\$	<u><u>1,250.35</u></u>	

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**Invoice No. 2335698**

Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

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All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300





Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2335698**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000012  
De Paul Ventures - San Jose Dialysis, LLC

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	C. Keyser	0.50	174.25	B130	Research statutory requirements for dissolution.
08/31/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/01/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/02/20	C. Keyser	0.30	104.55	B130	Work on dissolution.
09/03/20	C. Keyser	1.00	348.50	B130	Work on dissolution.
09/04/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/04/20	L. Isenhower	1.20	408.00	B130	Phone call with C. Keyser regarding Dissolution and Statement of Information. Prepare CA Statement of Information for De Paul Ventures - San Jose Dialysis, LLC and provide evidence of same.
<b>Subtotal</b>		<b>4.50</b>	<b>1,558.05</b>		

De Paul Ventures - San Jose Dialysis, LLC  
Matter: 15800425-000012  
Invoice No.: 2335698

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
B130	Asset Disposition	1,558.05
	Total This Matter	\$1,558.05

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Keyser	\$348.50	3.30	\$1,150.05
L. Isenhower	\$340.00	<u>1.20</u>	<u>\$408.00</u>
Totals		4.50	\$1,558.05
	Fee Total	\$ 1,558.05	
	Invoice Total	<u>\$ 1,558.05</u>	

The logo for Dentons, featuring the word "DENTONS" in white capital letters on a purple rectangular background.

Main Document

Page 1289 of 1288

SNR Denton US LLP  
2040 E. Mariposa Avenue  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321661**

Matter: 15800425-000009  
Verity Business Services

Payment Due Upon Receipt

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Total This Invoice	\$ 2,194.70
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SNR Denton US LLP  
8000 Sears Tower  
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OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

Invoice No. 2321661

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000009  
Verity Business Services

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	C. Keyser	0.50	174.25	B130	Research statutory requirements for dissolution.
08/29/20	J. DiChiara	2.20	944.35	B130	Review organizational documents and California law in connection with proposed dissolution of Verity Business Services (1.8); draft and revise dissolution materials; confer with C. Keyser regarding the same (.4).
08/31/20	K.M. Howard	0.40	100.30	B130	Email exchange with R. Garms regarding additional corporate documents for VBS (.1); reviewed corporate in Cain Brothers Database and assembled requested documents (.3).
08/31/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/01/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
09/02/20	C. Keyser	0.30	104.55	B130	Work on dissolution.
09/03/20	C. Keyser	1.00	348.50	B130	Work on dissolution.
09/04/20	C. Keyser	0.50	174.25	B130	Work on dissolution.
	<b>Subtotal</b>	<b>5.90</b>	<b>2,194.70</b>		

Verity Business Services  
Matter: 15800425-000009  
Invoice No.: 2321661

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b>Task Code</b>	<b>Task Code Name</b>	<b>Fees</b>
B130	Asset Disposition	2,194.70
	Total This Matter	\$2,194.70

**TIME AND FEE SUMMARY**

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Keyser	\$348.50	3.30	\$1,150.05
J. DiChiara	\$429.25	2.20	\$944.35
K.M. Howard	\$250.75	<u>0.40</u>	<u>\$100.30</u>
Totals		5.90	\$2,194.70
Fee Total	\$	2,194.70	
Invoice Total	\$	<u>2,194.70</u>	

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Page 182 of 228

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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321672**

Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

Payment Due Upon Receipt

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Total This Invoice	\$ 261,325.20
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8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321672**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000020  
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
2:20-ap-01001-ER

**APP - Appellate Proceedings**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	K.M. Howard	0.40	100.30	APP	Analysis of Ninth Circuit Mediation Assessment Order and reviewed and revised Critical Dates Memorandum.
08/20/20	T. Moyron	0.20	119.85	APP	Analyze G. Klausner email re appeal (.1); analyze related correspondence (.1).
08/20/20	K.M. Howard	0.50	125.38	APP	Analysis of SGM's Notice of Appeal and Statement of Election appealing the order confirming the modified second amended joint plan and reviewed and revised Critical Dates Memorandum (.4); reviewed appellate rules regarding same (.1).
08/20/20	N. Koffroth	1.20	601.80	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order
08/20/20	M. Zeefe	0.10	48.03	APP	Review SGM notice of appeal of confirmation order.
08/20/20	T. Moyron	0.10	59.93	APP	Prepare email to H. Grobstein re SGM filing.
08/21/20	N. Koffroth	7.80	3,911.70	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order
08/21/20	K.M. Howard	0.20	50.15	APP	Analysis of Notice of Referral of Appeal to the United States District Court.
08/22/20	N. Koffroth	2.40	1,203.60	APP	Research and analysis of issues related to proposed emergency stay of confirmation order
08/24/20	N. Koffroth	2.70	1,354.05	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	K.M. Howard	0.40	100.30	APP	Analysis of USDC's Notice Regarding Appeal from Bankruptcy Court and reviewed and revised Critical Dates Memorandum in SGM v. Verity, Case No. 2:20-cv-07632-JGB.
08/25/20	N. Koffroth	3.40	1,705.10	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order
08/26/20	K.M. Howard	0.60	150.45	APP	Analysis of SGM's Emergency Motion for Limited Stay Pending Appeal in SGM v. Verity, USDC Case 2:20-cv-07632-JGB appeal and reviewed and revised Critical Dates Memorandum (.4); reviewed Notice of Related Cases (.1); brief review of Appendix (.1).
08/27/20	N. Koffroth	2.10	1,053.15	APP	Draft opposition to emergency motion to stay adversary proceeding
08/28/20	N. Koffroth	1.70	852.55	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order
08/29/20	N. Koffroth	10.20	5,115.30	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order
08/31/20	N. Koffroth	0.20	100.30	APP	Participate in call with I. Hsu re appendix in support of opposition to emergency motion to stay effectiveness of confirmation order
08/31/20	N. Koffroth	1.10	551.65	APP	Draft opposition to emergency motion to stay effectiveness of confirmation order
08/31/20	I. Hsu	0.20	89.25	APP	Phone call regarding appendix for opposition to motion to stay the confirmation order.
09/01/20	I. Hsu	4.20	1,874.25	APP	Draft appendix for opposition to emergency motion to stay confirmation order.
09/01/20	I. Hsu	0.20	89.25	APP	Correspondence re appendix for opposition to emergency motion to stay confirmation order.
09/01/20	N. Koffroth	8.70	4,363.05	APP	Draft opposition to emergency motion to stay confirmation order
09/01/20	K.M. Howard	0.30	75.23	APP	Analysis of order transferring appeal from Judge Kronstadt to Judge Fischer (.1); reviewed and revised Critical Dates Memorandum (.2).



Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/20	K.M. Howard	0.50	125.38	APP	Analysis of the Attorney General's Statement of Issues on Appeal and Designation of Record (.1); reconciled same with USDC docket and Critical Dates Memorandum (.3); reviewed email from T. Moyron and N. Koffroth regarding same (.1).
09/02/20	N. Koffroth	15.80	7,923.70	APP	Draft opposition to emergency motion to stay confirmation order and Chadwick and Adcock declarations in support thereof
09/02/20	S. Maizel	0.60	480.00	APP	Review and revise motion to dismiss SGM Counterclaims.
09/02/20	C. Montgomery	2.10	1,680.00	APP	Communications with S Martin re response to SGM stay request and review cases re Same (1.4); phone calls with N Koffroth re same (.2); communications re corrections to Supporting Declarations for SHM stay request (.5)
09/02/20	K.M. Howard	0.20	50.15	APP	Analysis of Critical Dates Memorandum to determine briefing schedule before the Ninth Circuit (.1); prepared memorandum to T. Moyron regarding same (.1).
09/02/20	G. Medina	5.90	1,730.18	APP	Assisted N. Koffroth and I. Hsu Prepare and assemble Appendix Exhibits for Opposition to SGM Stay Confirmation Order.
09/02/20	I. Hsu	1.00	446.25	APP	Draft RJN for appendix documents filed in support of opposition to emergency motion to stay confirmation order.
09/02/20	I. Hsu	0.50	223.13	APP	Correspondence re appendix in support of opposition to emergency motion to stay confirmation order.
09/02/20	I. Hsu	4.70	2,097.38	APP	Draft and compile appendix in support of opposition to emergency motion to stay confirmation order.
09/03/20	T. Moyron	0.30	179.78	APP	Exchange emails with Committee counsel re SGM request to consolidate (.2); prepare email to SGM's counsel (.1).
09/03/20	K.M. Howard	0.40	100.30	APP	Analysis of SGM's Designation of Record on Appeal and reviewed and revised Critical Dates Memorandum accordingly.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	S. Martin	0.30	228.23	APP	Email relating to briefing on appeals of vacatur order.
09/04/20	K.M. Howard	0.20	50.15	APP	Analysis of Notice of Errata to Debtors' Motion to Dismiss SGM's Amended Counterclaims and reconciled same to Critical Dates Memorandum.
09/04/20	S. Martin	0.30	228.23	APP	Review reply by SGM in support of motion to stay plan and related email.
	<b>Subtotal</b>	<b>81.70</b>	<b>39,237.48</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

**B100 - Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/20	C. Mercado	0.50	138.13	B100	Convert selected KPC website pages to PDF for S. Martin.
08/12/20	Barbara Fullerton	0.30	82.88	B100	Research dates and code source for KCPhealth article for Isabella Hsu.
08/12/20	C. Mercado	0.40	110.50	B100	Convert selected KPC website page and Bloomberg website page to PDF for S. Martin.
08/12/20	I. Hsu	2.30	1,026.38	B100	Phone call re KPC articles (.6); correspondence re KPC articles (1.7).
08/13/20	C. Mercado	0.30	82.88	B100	Compile selected KPC and Bloomberg website pages.
	<b>Subtotal</b>	<b>3.80</b>	<b>1,440.77</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

**B110 - Case Administration**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/20	K.M. Howard	0.40	100.30	B110	Analysis of Notice Continuing Status Conference and reviewed and revised Critical Dates Memorandum.
08/18/20	K.M. Howard	0.20	50.15	B110	Reviewed Critical Dates Memorandum (.1); email exchange with I. Hsu regarding Verity v. SGM deadlines (.1).
	<b>Subtotal</b>	<b>0.60</b>	<b>150.45</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

**B130 - Asset Disposition**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	I. Hsu	1.30	580.13	B130	Edit initial disclosures (1.0); coordinate service (.3)..
08/03/20	K.M. Howard	0.70	175.53	B130	Email exchanges with S. Martin (.1); assembled SGMs discovery for client (.2); reviewed email from S. Martin regarding SGM's discovery (.1); compare interrogatories and requests to produce drafted to Debtors (.2); prepared email to S. Martin regarding differences (.1).
08/03/20	S. Martin	0.60	456.45	B130	Communicate with debtors' counsel regarding plaintiffs' discovery requests and initial disclosures (.4); review defendants' initial disclosures (.2).
08/03/20	C. Montgomery	0.30	240.00	B130	Communications with S Martin and T Moyron regarding SGM witnesses and preliminary disclosures.
08/04/20	S. Martin	0.40	304.30	B130	Review order denying defendants' motion to dismiss and communications regarding same.
08/04/20	J. Whipple	0.60	316.20	B130	Review Order denying dismissal of First Amended Complaint.
08/05/20	J.K. Park	1.80	1,025.10	B130	Telephone conference with Attorney S. Martin regarding case status and discovery issues (0.4); review and analyze First Amended Complaint and Defendants' Answer and Cross-Claims (1.0); briefly review discovery propounded by Defendants (0.3); conference with attorney R. Ross regarding analyzing discovery propounded by Defendants (0.1).
08/05/20	I. Hsu	0.80	357.00	B130	Research prejudgment interest.
08/05/20	I. Hsu	0.20	89.25	B130	Review SGM's initial disclosures.
08/05/20	S. Martin	1.30	988.98	B130	

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/05/20	Rachel Ross	2.50	860.63	B130	Compile discovery requests [REDACTED] [REDACTED]
08/06/20	Rachel Ross	2.70	929.48	B130	Compile discovery requests [REDACTED] [REDACTED]
08/06/20	Rachel Ross	3.00	1,032.75	B130	Draft master discovery requests [REDACTED]
08/06/20	I. Hsu	0.80	357.00	B130	Review RFP Set One (.2); attend discovery call (.6).
08/06/20	I. Hsu	1.60	714.00	B130	Review special interrogatories and requests for admissions served on Verity entities (.6); draft responses (1.0).
08/06/20	J. Whipple	0.80	421.60	B130	Conference and correspondence regarding discovery [REDACTED] [REDACTED].
08/06/20	S. Martin	0.80	608.60	B130	Call and email with debtors' counsel regarding discovery [REDACTED] [REDACTED]
08/06/20	J.K. Park	0.80	455.60	B130	Telephone conference with team regarding discovery strategy (0.4); review and revise draft requests for documents to defendants (0.4).
08/06/20	N. Koffroth	0.40	200.60	B130	Participate in internal call re discovery issues
08/07/20	S. Martin	0.20	152.15	B130	Prepare requests for production to defendants.
08/07/20	J.K. Park	1.30	740.35	B130	Begin working on response to SGM's discovery.
08/08/20	T. Moyron	0.90	539.33	B130	Analyze and prepare comments to request for production of documents (.8); correspond regarding same (.1).

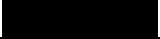
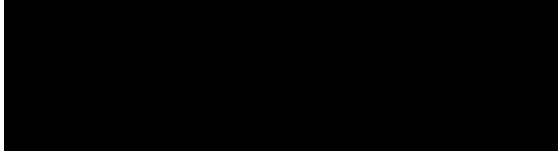
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/09/20	S. Martin	0.30	228.23	B130	Prepare requests for production to defendants and communications regarding same.
08/09/20	J.K. Park	4.30	2,448.85	B130	Attend to discovery including further revising request for documents to defendants and responding to SGM's requests for production of documents.
08/10/20	S. Martin	1.90	1,445.43	B130	Prepare responses to defendants' interrogatories and requests for admission and communications related to same.
08/10/20	S. Maizel	0.40	320.00	B130	Telephone conference with S. Polard re SGM allegations.
08/10/20	I. Hsu	0.90	401.63	B130	Discovery call with S. Martin.
08/10/20	I. Hsu	1.20	535.50	B130	Collect and summarize bankruptcy dockets for J. Park.
08/10/20	Rachel Ross	2.20	757.35	B130	Legal research of California law single enterprise theory of the alter ego doctrine [REDACTED]
08/11/20	S. Martin	2.50	1,901.88	B130	Continue preparing discovery responses (1.3); prepare email to defendants' counsel regarding same (.1); communicate with debtors regarding same (.1); review and analyze SGM's sur-reply filed in bankruptcy for issues relating to claims in adversary proceeding (.6); confer with debtors' counsel regarding same (.2); review and circulate SGM response to motion to dismiss (.2).
08/11/20	Rachel Ross	1.30	447.53	B130	Finalize research on single enterprise theory and summarize for J. Park
08/11/20	I. Hsu	1.00	446.25	B130	Draft discovery responses to SGM requests.
08/12/20	I. Hsu	0.30	133.88	B130	Correspondence re discovery requiring client input.
08/12/20	S. Martin	0.90	684.68	B130	Review corporate and ownership information, press and court filings regarding plaintiffs and confer with C. Montgomery and T. Moyron (.9).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/20	J.K. Park	3.50	1,993.25	B130	Continue working on objections and responses to SGM's requests for documents.
08/12/20	C. Montgomery	0.20	160.00	B130	Phone call with S. Martin regarding requests to admit.
08/13/20	A. Ruegger	1.10	880.00	B130	Review draft document requests to SGM (0.3); communications with Dentons Team re revisions to same (0.8).
08/13/20	S. Martin	2.10	1,597.58	B130	Prepare discovery to defendants and related communications (.4); 
08/13/20	J.K. Park	4.60	2,619.70	B130	Review, revise, and supplement request for documents to SGM defendants (2.5); 
08/13/20	R. Richards	0.50	361.50	B130	Review and comment on draft discovery request to SGM.
08/13/20	C. Montgomery	1.60	1,280.00	B130	Review and suggest revision to S Martin regarding discovery issues.
08/13/20	I. Hsu	7.10	3,168.38	B130	Draft responses to SGM discovery.
08/14/20	K.M. Howard	2.10	526.58	B130	Email exchange with T. Moyron regarding pleadings filed in USDC case (.1); reviewed docket and assembled all pleadings filed in USDC case for liquidating trustee (1.9); telephone conference with T. Moyron regarding liquidating trustee (.1).
08/14/20	I. Hsu	2.30	1,026.38	B130	Draft responses to SGM discovery.
08/14/20	I. Hsu	0.70	312.38	B130	Correspondence with J. Park re discovery responses.



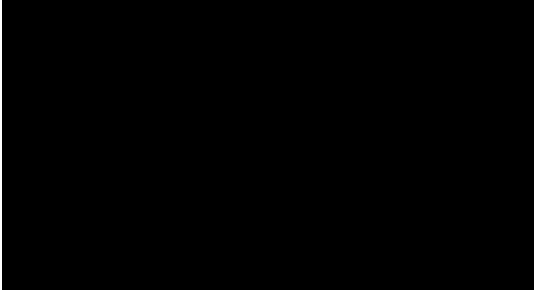
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	S. Martin	2.00	1,521.50	B130	Confer with BRG regarding KPC issues (.1); prepare third party subpoenas (.1); communicate with debtors, BRG Cain and debtors' counsel regarding discovery responses and document collection (1.8).
08/14/20	J.K. Park	1.90	1,082.05	B130	Continue working on responses and objections to SGM's request for documents.
08/14/20	J.K. Park	0.50	284.75	B130	Attend telephone conference with Cain Brothers regarding document retention [REDACTED].
08/14/20	T. Moyron	3.70	2,217.23	B130	Analyze and address matters related to SGM litigation and calls regarding same.
08/17/20	J.K. Park	5.70	3,246.15	B130	Continue working on objections and responses to SGM's requests for documents.
08/17/20	I. Hsu	0.30	133.88	B130	Correspondence re discovery documents.
08/17/20	S. Martin	1.60	1,217.20	B130	Draft responses to requests for admissions and interrogatories.
08/18/20	J.K. Park	4.00	2,278.00	B130	Review and analyze SGM's initial disclosures (.7); [REDACTED]
08/18/20	S. Martin	2.00	1,521.50	B130	Prepare emails regarding document collection (.7); continue drafting responses to requests for admission (.2); prepare for and participate in call with Trustee and debtors' counsel, including follow up (1.1).
08/18/20	S. Maizel	1.20	960.00	B130	Telephone conference with Liquidating Trustee re SGM adversary proceeding (1.0); telephone conference with S. Martin, et al re same (.2).
08/18/20	I. Hsu	1.00	446.25	B130	Summarize pre-trial deadlines in email.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/20	I. Hsu	0.80	357.00	B130	Correspondence re Verity discovery responses.
08/19/20	J.K. Park	5.10	2,904.45	B130	
08/19/20	S. Maizel	1.10	880.00	B130	
08/19/20	C. Montgomery	1.20	960.00	B130	
08/19/20	S. Martin	1.70	1,293.28	B130	
08/19/20	T. Moyron	1.70	1,018.73	B130	Telephone conference with Sonia Martin, etc. re SGM requests for admissions.
08/19/20	N. Koffroth	0.30	150.45	B130	Participate in phone conference with S Martin, T Moyron, S Maizel regarding SGM discovery requests.
08/19/20	I. Hsu	3.30	1,472.63	B130	Confer with R. Adcock regarding document collection efforts (.5); confer with debtors' counsel regarding responses to requests for admission (1.2).
08/20/20	T. Moyron	1.50	898.88	B130	Conference call with S. Martin regarding response to request for admission and other litigation matters.
08/20/20	T. Moyron	0.40	239.70	B130	Participate in call with J. Park re discovery matters
					Edit Verity responses to interrogatories served by Defendants.
					Conference call with S. Martin, et al. re interrogatories (1.0); analyze correspondence from Cain, et al (.2); analyze previous SGM correspondence (.3).
					Analyze First Amended Answer and Counterclaims (.3); prepare correspondence to H. Grobstein, et al. re same (.1).

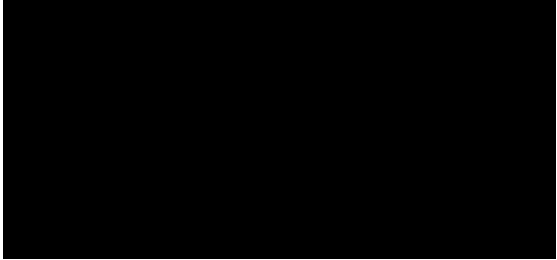
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/20/20	K.M. Howard	0.70	175.53	B130	Analysis of SGM's First Amended Answer to Verity's First Amended Complaint and SGM's First Amended Counterclaims and reviewed and revised Critical Dates Memorandum (.4); revised USDC rules pertaining to responding to amended counterclaims (.1); reviewed and revised Critical Dates Memorandum (.2).
08/20/20	J.K. Park	6.70	3,815.65	B130	Work on objections and responses to SGM's special interrogatories and requests for admission (6.2); [REDACTED]
08/20/20	S. Martin	3.90	2,966.93	B130	Review documents received from R. Adcock, Cain and debtors' counsel (.4); continue drafting interrogatory responses and request for admission responses (1.8); confer with debtors' counsel regarding same (1); review research regarding proper scope of requests for admissions (.1); review correspondence regarding notice of appeal of plan confirmation order (.1); review and comment on draft responses to requests for production (.4); confer with T. Moyron regarding Ninth Circuit mediation conference (.1).
08/20/20	C. Montgomery	1.00	800.00	B130	Participate in phone conference with S Martin S Maizel and T Moyron regarding discovery responses.
08/20/20	S. Maizel	1.00	800.00	B130	Telephone conference with S. Martin, et al re SGM interrogatories.
08/20/20	I. Hsu	0.60	267.75	B130	Review amended counterclaims from SGM.
08/20/20	I. Hsu	0.20	89.25	B130	Correspondence re red line for SGM amended counterclaims.
08/21/20	I. Hsu	0.60	267.75	B130	Review amended counterclaims (.3); correspondence re redlining of counterclaims (.3)

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/21/20	J.K. Park	7.70	4,385.15	B130	
08/21/20	T. Moyron	1.50	898.88	B130	Conference calls with S. Martin, D. Galfus, E. Paul.
08/21/20	J. Whipple	3.80	2,002.60	B130	Review SGM's First Amended Answer, Affirmative Defenses, and Counterclaim (1.0) and response deadline associated therewith (.4); research grounds for dismissal of new SGM Count IIII (2.4).
08/21/20	S. Maizel	0.10	80.00	B130	Review and respond to emails re discovery issues.
08/21/20	S. Maizel	0.60	480.00	B130	Telephone conference with S. Martin, et al re damages issues.
08/21/20	C. Montgomery	1.40	1,120.00	B130	Phone conference T Moyron, S Martin, D Galfus re interrogatories and damages (1.0) ; communications with S Martin and T Moyron re defense counsel communications (.3) ; communications with S Martin and T Moyron regarding discovery timing (.1)
08/21/20	S. Clark	0.50	216.75	B130	Initial discussion with J. Park regarding matter specifics and support opportunities.
08/21/20	S. Martin	5.20	3,955.90	B130	Review and analyze defendants' amended counterclaim (.8); attention to motion to dismiss (.3); communications with debtors and counsel and BRG regarding claims and discovery issues (3.5); continue drafting discovery responses (.6).
08/22/20	I. Hsu	0.20	89.25	B130	Correspondence re SGM's First Amended Counterclaims.
08/22/20	S. Martin	7.50	5,705.63	B130	Continue drafting responses to requests for admission (2.8); continue drafting interrogatory responses (2.7); conference with debtors' counsel regarding case management (2).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/22/20	C. Montgomery	2.20	1,760.00	B130	
08/22/20	S. Maizel	2.20	1,760.00	B130	
08/23/20	S. Maizel	1.30	1,040.00	B130	Telephone conference with Sonia Martin re responses to SGM discovery (.3); review and revise reply to SGM RFP (.5); review and revise response to SGM interrogatories (.5).
08/23/20	C. Montgomery	5.60	4,480.00	B130	
08/23/20	I. Hsu	0.70	312.38	B130	Revise Verity's first set of RFPs.
08/23/20	S. Martin	3.90	2,966.93	B130	Continue draft requests for production (.6); further prepare responses to contention interrogatories and requests for admission (2.5); communicate with debtors' counsel regarding same (.8).
08/24/20	T. Moyron	1.20	719.10	B130	Analyze matters related to discovery and SGM correspondence.
08/24/20	I. Hsu	0.30	133.88	B130	Correspondence re KPC website statements.
08/24/20	I. Hsu	1.40	624.75	B130	Prepare document with BRG.
08/24/20	I. Hsu	1.30	580.13	B130	Update Verity discovery responses.
08/24/20	S. Martin	3.10	2,358.33	B130	Prepare discovery responses and communications regarding same (2.4); attend Ninth Circuit mediation conference (.3); prepare email to defense counsel regarding alter ego issues and meet and confer regarding counterclaim (.4).
08/24/20	K.M. Howard	0.10	25.08	B130	Email exchange with I. Hsu regarding retention of BRG as experts.
08/24/20	K.M. Howard	0.10	25.08	B130	Email exchange with S. Martin regarding deadline to respond to amended counterclaims.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/20	C. Montgomery	1.30	1,040.00	B130	Communications with S Martin regarding defense counsel communications (.1) ; phone call with S Martin (.2) ; phone conference re post effective date case management with S Martin, J Horwath, T Moyron (1.0)
08/24/20	S. Maizel	0.30	240.00	B130	Telephone conference with S. Martin re discovery issues.
08/24/20	S. Maizel	1.60	1,280.00	B130	Telephone conference with T. Moyron, C. Lipari, S. Martin, et al re litigation strategy (1.0); telephone conference with T. Moyron re same (.6).
08/25/20	T. Moyron	3.70	2,217.23	B130	Analyze SGM's counterclaim and claim for tortious breach of contract (.3); research and analysis cases regarding same (2.8); correspond regarding same (.2); analyze matters regarding discovery and related correspondence (.4).
08/25/20	T. Moyron	0.80	479.40	B130	Conference call with S. Martin, et al. re answer, counterclaim and related actions.
08/25/20	K.M. Howard	0.40	100.30	B130	Analysis of the court order taking the August 31st hearing off calendar in light of the filing of the Amended Counterclaim and reviewed and revised Critical Dates Memorandum.
08/25/20	N. Koffroth	0.70	351.05	B130	Participate in internal call re amended counterclaims
08/25/20	J. Whipple	2.10	1,106.70	B130	Strategy correspondence regarding grounds to dismiss counterclaims (1.0); review November 2019 letter referenced in counterclaims for potential litigation privilege (1.1)

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/20	S. Martin	3.90	2,966.93	B130	Analyze grounds for motion to dismiss and communicate with debtors' counsel regarding same (2.7); communicate with debtors and debtors' counsel regarding discovery responses (.2); prepare draft document for BRG (.2); review bankruptcy court order regard plan confirmation and SGM litigation (.2); communicate with debtors' counsel regarding document collection (.1); communicate with debtors regarding discovery responses (.2); continue drafting discovery responses (.3).
08/25/20	S. Maizel	1.40	1,120.00	B130	Telephone conference with S. Martin, etc. re SGM counterclaims (.7); telephone conference with T. Moyron re same (.7).
08/25/20	J.K. Park	0.30	170.85	B130	
08/25/20	C. Montgomery	0.10	80.00	B130	Communications with S Martin re amended counterclaim.
08/25/20	C. Montgomery	0.90	720.00	B130	Phone call with T Moyron re trial management (.2) ; phone conference with S Marin and T Moyron re counterclaim defense (.7)
08/26/20	I. Hsu	1.20	535.50	B130	Draft sets of offensive discovery for each defendant in adversary proceeding.
08/26/20	I. Hsu	0.30	133.88	B130	Prepare document with BRG.
08/26/20	J. Whipple	7.60	4,005.20	B130	Complete researching and first draft of Motion to Dismiss SGM's Amended Counterclaim (3.8);

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/20	S. Martin	5.60	4,260.20	B130	Analysis regarding motion to dismiss amended counterclaim and communicate with debtors' counsel regarding same (2.2); continue drafting requests for production and communications relating to same (.6); draft responses to defendants' discovery requests and confer with debtors and their counsel regarding same (1.7); prepare for and participate in meet and confer with SGM's counsel regarding motion to dismiss or strike (1); review notice of related case and appellate designations and referrals (.1).
08/26/20	T. Moyron	2.80	1,677.90	B130	Meet and confer with SGM, plus S. Martin, S. Maizel (.6); call with R. Adcock, BRG, et al. re discovery (1.0); call with S. Martin, S. Maizel re case management (.4); analyze J. Schlant, et al. emails re discovery (.2); conference call with E. Paul, H. Levy-Biehl, et al. re counterclaim and allegations (.5); Call with J. Park and J. Chesley re Board document request (.1).
08/26/20	T. Moyron	1.20	719.10	B130	Analyze cases regarding tortious breach and issues raised on meet and confer.
08/26/20	J.K. Park	2.50	1,423.75	B130	Telephone conference with J. Chesley regarding communications with board members to discuss document collection (.2); attend to responses to SGM's discovery (2.3).
08/26/20	S. Maizel	2.00	1,600.00	B130	Telephone conference with R. Adcock, et al re response to discovery (1.2); telephone conference with S. Martin re same (.4); telephone conference with T. Moyron re same (.4).
08/26/20	S. Maizel	0.50	400.00	B130	Telephone conference with SGM counsel re meet and confer.
08/26/20	N. Koffroth	1.80	902.70	B130	Participate in meet and confer concerning counterclaim with G. Klausner, S. Martin, et al. (0.6); participate in call with R. Adcock, P. Chadwick, et al. re adversary proceeding (1.2)
08/27/20	J. Whipple	3.10	1,633.70	B130	Research and draft responses to opposing counsel's meet-and-confer arguments regarding dismissal.




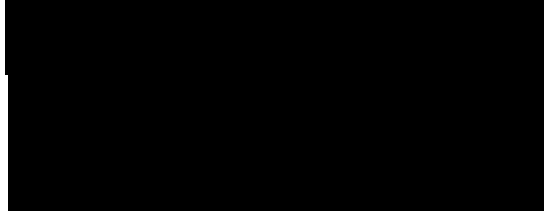
Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/27/20	S. Maizel	1.20	960.00	B130	Telephone conference with S. Martin, et al re SGM interrogatories.
08/27/20	I. Hsu	0.30	133.88	B130	Phone call re discovery to defendants.
08/27/20	I. Hsu	0.20	89.25	B130	Phone call re discovery responses from Verity entities.
08/27/20	I. Hsu	1.10	490.88	B130	Edit discovery requests.
08/27/20	S. Martin	3.90	2,966.93	B130	Review legal authorities cited by SGM's counsel during meet and confer and prepare arguments for motion to dismiss amended counterclaim (.9); continue drafting responses to interrogatories and communicate with debtors and debtors' counsel regarding same (1.3); continue drafting responses to requests for admissions and communicate with debtors and debtors' counsel regarding same (1.5); finalize discovery to defendants (.2).
08/27/20	C. Montgomery	2.00	1,600.00	B130	Review draft responses to requests for admission and communications with S Martin re same (1.1); communications with T Moyron regarding interrogatories (.1) ; participate in post effective date case management call (.8)
08/28/20	C. Montgomery	0.10	80.00	B130	Communications with S Martin, T Moyron re expert witness issues.
08/28/20	C. Montgomery	0.60	480.00	B130	Communications with S Martin regarding RFA issues (.5) ; follow up communications regarding experts (.1)
08/28/20	J. Whipple	1.30	685.10	B130	Review strategy correspondence regarding edits to motion to dismiss SGM's counterclaims, including Plan and Confirmation Order and related documentation.
08/28/20	N. Koffroth	2.50	1,253.75	B130	Participate in internal call re discovery issues
08/28/20	I. Hsu	0.60	267.75	B130	Update discovery responses.
08/28/20	I. Hsu	0.80	357.00	B130	Coordinate print and delivery of discovery responses.
08/28/20	S. Maizel	0.80	640.00	B130	Telephone conference with counsel for UCC, Mintz Levin, etc. re SGM Motion to stay for appeal from confirmation order.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/28/20	S. Maizel	2.50	2,000.00	B130	Telephone conference with R. Adcock, BRG, Sonia Martin, et al re RFP, etc. from SGM (2.3); telephone conference with T. Moyron re same (.2).
08/28/20	S. Martin	8.10	6,162.08	B130	Continue drafting responses to requests for admission and interrogatories and communications regarding same (5.6); draft responses to requests for production and confer with debtors and their counsel regarding same (1.7); draft motion to dismiss amended counterclaim (.5); review BRG documents (.3).
08/28/20	T. Moyron	2.10	1,258.43	B130	Conference call with BRG, R. Adcock, S. Martin, et al. re discovery.
08/28/20	J.K. Park	7.30	4,157.35	B130	Work on document demands to SGM (3.3); work on responses to SGM's request for documents (4.0).
08/29/20	J.K. Park	2.50	1,423.75	B130	Further revise and supplement responses to SGM's request for documents.
08/29/20	J.K. Park	1.90	1,082.05	B130	Review and analyze amended counterclaim by SGM and consider further revisions to updated litigation hold.
08/29/20	S. Martin	1.60	1,217.20	B130	Continue drafting responses to requests for admissions and interrogatories and communications with debtors and their counsel regarding same.
08/29/20	S. Maizel	0.20	160.00	B130	Telephone conference with T. Moyron re SGM discovery responses.
08/29/20	T. Moyron	0.30	179.78	B130	Analyze discovery matters and related correspondence.
08/30/20	J.K. Park	1.30	740.35	B130	Attend to finalizing responses to SGM's discovery (.5); 
08/30/20	Rachel Ross	1.40	481.95	B130	
08/30/20	T. Moyron	0.30	179.78	B130	Analyze correspondence regarding discovery matters.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/20	S. Martin	2.70	2,054.03	B130	Continue drafting motion to dismiss amended counterclaim (.9); continue drafting discovery responses and communicate with debtors and their counsel regarding same (1.8).
08/30/20	C. Montgomery	4.30	3,440.00	B130	Communications with S Martin and S Maizel regarding requests for admission (1.6); review responses to requests for production of documents (.6); review draft responses to interrogatories and communications with S Martin re same (2.1)
08/31/20	C. Montgomery	0.10	80.00	B130	Communications with S Martin and J Park re stipulated protective order.
08/31/20	J. Whipple	3.60	1,897.20	B130	Incorporate additional edits from litigation team and research into motion to dismiss SGM's Counterclaims.
08/31/20	J.K. Park	6.60	3,758.70	B130	Attend to various discovery issues including review and analyze proposed protective order and consider strategy for revisions (3.2); work on task list of action items in SGM litigation (.8); work on strategy for third party subpoenas and identify potential third parties who were SGM consultants for same (2.6).
08/31/20	I. Hsu	1.70	758.63	B130	Update requests for production across 6 defendants (1.2); correspondence re offensive discovery requests (.5).
08/31/20	I. Hsu	1.00	446.25	B130	Review sample protective orders and draft protective order (.7); correspondence re draft protective order (.3).
08/31/20	I. Hsu	0.50	223.13	B130	Correspondence with docketing re discovery deadlines.
08/31/20	S. Martin	2.70	2,054.03	B130	Communicate with T. Moyron and defendants' counsel regarding plaintiffs' discovery responses (.2); draft motion to dismiss amended counterclaim (1.6); attention to third party subpoenas (.3); review and comment on proposed protective order (.3); attention to supplemental litigation hold (.3).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/20	T. Moyron	0.70	419.48	B130	Analyze email from J. Meyer re one-week extension (.1); correspond regarding litigation hold (.2); analyze discovery matters (.2); analyze email from J. Meyer re stipulated protective order (.1); analyze related correspondence (.1).
09/01/20	I. Hsu	1.20	535.50	B130	Finalize offensive discovery for service.
09/01/20	S. Maizel	0.40	320.00	B130	Telephone conference with T. Moyron, etc. re SGM litigation.
09/01/20	J.K. Park	0.40	227.80	B130	Final review of draft requests for production to SGM.
09/01/20	C. Montgomery	0.50	400.00	B130	
09/01/20	J. Whipple	2.60	1,370.20	B130	Incorporate S. Martin's additional edits into motion to dismiss Defendants' Counterclaims.
09/01/20	S. Martin	1.70	1,293.28	B130	Continue drafting discovery responses (.2); continue drafting motion to dismiss counterclaim (1.3); review SGM response to Bankruptcy Court order on limited objection (.2).
09/02/20	S. Maizel	0.70	560.00	B130	Review and revise opposition to SGM motion for stay pending appeal.
09/02/20	T. Moyron	3.20	1,917.60	B130	Analyze updated opposition, prepare and finalize re SGM Limited Stay.
09/02/20	J. Whipple	2.40	1,264.80	B130	Incorporate additional litigation team research and edits into Motion to Dismiss Counterclaims.
09/02/20	S. Martin	3.80	2,890.85	B130	Continue preparing responses to interrogatories and requests for admission (1.1); draft motion to dismiss amended counterclaim (2.5); review and comment on opposition to SGM motion for limited stay (.2).
09/02/20	J.K. Park	4.30	2,448.85	B130	Review, analyze and revise draft motion to dismiss SGM's counter-claims (3.0); attend to further issues in preparing responses to SGM's discovery (1.3).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/20	I. Hsu	2.40	1,071.00	B130	Update RJN for motion to dismiss amended counterclaims (1.3); update citations in motion to dismiss amended counterclaims (.9); correspondence re RJN (.2).
09/03/20	J.K. Park	5.70	3,246.15	B130	Analyze prior motions to dispose of records and assess whether motions need to be supplemented or new motions to amend orders must be filed (1.7); research on whether bankruptcy court's order authorizing disposal impacts obligation to preserve records (1.2); work on proposed protocol for the production of electronic records (0.8); further revise and supplement response to SGM's Requests for Admission (2.0).
09/03/20	Rachel Ross	1.40	481.95	B130	Legal research of case law [REDACTED]
09/03/20	S. Maizel	0.70	560.00	B130	Review and respond to emails re response to SGM RFAs.
09/03/20	S. Maizel	0.40	320.00	B130	Review and revise motion to dismiss amended counterclaims.
09/03/20	N. Koffroth	2.10	1,053.15	B130	Draft motion to dismiss amended counterclaim
09/03/20	I. Hsu	0.20	89.25	B130	Correspondence with J. Park re documents needed for discovery responses.
09/03/20	I. Hsu	7.30	3,257.63	B130	Cite checking for motion to dismiss SGM's amended counterclaims (4.0); revise motion to dismiss SGM's amended counterclaims (2.0); correspondence re motion to dismiss (.5); coordination for filing (.8).
09/03/20	I. Hsu	0.60	267.75	B130	Confirmation and correspondence re hearing date calendaring.
09/03/20	C. Montgomery	0.10	80.00	B130	Communications with T Moyron re post effective date staffing.
09/03/20	S. Martin	4.00	3,043.00	B130	Work on motion to dismiss amended counterclaim and supporting papers (2.4); work on discovery responses (1.6).

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	J. Whipple	3.70	1,949.90	B130	Incorporate client and litigation team edits and research into motion to dismiss SGM's counterclaims and review Request for Judicial Notice associated therewith, as well as ensure filing of same.
09/03/20	T. Moyron	2.10	1,258.43	B130	Analyze and prepare comments related to discovery and documents (.8); correspond with R. Adcock, et al. re same(.4); analyze and prepare comments to motion to dismiss (.6); correspond re same (.3).
09/03/20	S. Maizel	0.30	240.00	B130	Telephone conference with T. Moyron, S. Martin, etc. re SGM litigation issues.
09/04/20	J.K. Park	4.00	2,278.00	B130	
09/04/20	S. Martin	5.70	4,336.28	B130	Attention to corrected request for judicial notice (.4); continue preparing discovery responses and communications relating to same (5.1); communications with debtors and counsel regarding deposit (.2).
09/04/20	J. Whipple	1.90	1,001.30	B130	Draft and ensure filing of Corrected RJN and new exhibit, as well as review Notice of Errata.
09/04/20	S. Maizel	0.20	160.00	B130	Review and revise correspondence for trustee re SGM litigation.
09/04/20	S. Maizel	1.10	880.00	B130	Telephone conference with Jae Park response to SGM RFAs (.1); telephone conference with S. Martin re same (.1); review and respond to emails re same (.9).
09/04/20	I. Hsu	2.20	981.75	B130	Draft notice of errata (.9); edit corrected RJN (.5); correspondence re corrected RJN (.5); coordinate filing of notice of errata (.3).
09/04/20	I. Hsu	3.90	1,740.38	B130	Draft special interrogatory responses for all Verity entities.

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/20	C. Montgomery	0.40	320.00	B130	Conference call re post effective date staffing.
	<b>Subtotal</b>	<b>360.90</b>	<b>220,396.20</b>		

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	K.M. Howard	0.40	100.30	B190	Analysis of Debtors' Notice and Motion to Dismiss and/or Strike SGM's Amended Counterclaims and reviewed and revised Critical Dates Memorandum
	<b>Subtotal</b>	<b>0.40</b>	<b>100.30</b>		



Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al.  
Matter: 15800425-000020  
Invoice No.: 2321672

September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>
APP	Appellate Proceedings	39,237.48
B100	Administration	1,440.77
B110	Case Administration	150.45
B130	Asset Disposition	220,396.20
B190	Other Contested Matters (excl. assumption/rejection motions)	100.30
Total This Matter		\$261,325.20

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
C. Montgomery	\$800.00	26.00	\$20,800.00
S. Maizel	\$800.00	22.80	\$18,240.00
S. Martin	\$760.75	86.20	\$65,576.75
J.K. Park	\$569.50	84.70	\$48,236.65
R. Richards	\$723.00	0.50	\$361.50
T. Moyron	\$599.25	28.70	\$17,198.54
A. Ruegger	\$800.00	1.10	\$880.00
M. Zeefe	\$480.25	0.10	\$48.03
J. Whipple	\$527.00	33.50	\$17,654.50
N. Koffroth	\$501.50	65.10	\$32,647.65
I. Hsu	\$446.25	67.50	\$30,121.98
Rachel Ross	\$344.25	14.50	\$4,991.64
Barbara Fullerton	\$276.25	0.30	\$82.88
C. Mercado	\$276.25	1.20	\$331.51
G. Medina	\$293.25	5.90	\$1,730.18
K.M. Howard	\$250.75	8.80	\$2,206.64
S. Clark	\$433.50	<u>0.50</u>	<u>\$216.75</u>

Adv. Proceeding - Verity, et al. v. Chaudhuri, M.D., et al  
Invoice #: 2321672

September 30, 2020

Totals	447.40	\$261,325.20
Fee Total	\$ 261,325.20	
Invoice Total	<u>\$ 261,325.20</u>	

The logo for Dentons, featuring the word "DENTONS" in white capital letters on a purple rectangular background.

Main Document

Page 1321 of 1388

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Los Angeles, California 90017-5704  
Alston Hunt Floyd & Ing is now  
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Verity Health System of California, Inc.  
2040 E. Mariposa Avenue  
El Segundo, CA 90245  
USA

September 30, 2020

**Invoice No. 2321679**

Matter: 15800425-000021  
Adv. Proceeding -California Nurses association (CNA) v.  
Verity, et al. - 2:20-ap-01051-ER

Payment Due Upon Receipt

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Total This Invoice	\$ 21,921.28
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

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233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



Verity Health System of California, Inc.  
 2040 E. Mariposa Avenue  
 El Segundo, CA 90245  
 USA

September 30, 2020

**Invoice No. 2321679**

For Professional Services Rendered through September 4, 2020:

Matter: 15800425-000021  
 Adv. Proceeding -California Nurses association (CNA) v.  
 Verity, et al. - 2:20-ap-01051-ER

**B190 - Other Contested Matters (excl. assumption/rejection motions)**

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/20	A. Shiran	0.90	463.05	B190	Revise settlement agreement (.6); multiple correspondence with bankruptcy team regarding same (.3)
08/03/20	S. McCandless	0.70	559.30	B190	Review CNA's proposed changes to settlement agreement (.50); discuss same with A. Youssefi (.20).
08/04/20	S. Alberts	0.20	160.00	B190	Review and comment on CNA settlement agreement.
08/04/20	A. Shiran	1.70	874.65	B190	Discuss settlement revisions with T. Moyron (.2); correspondence with A. Ruda regarding same (.2); telephone conference with K. Skogstad regarding settlement revisions (.2); numerous correspondence with labor team and S. McCandless regarding revisions to agreement (.3); update and revise settlement agreement based on input of team (.6); correspondence with K. Skogstad regarding revised agreement (.1); correspondence with client regarding revised settlement agreement (.1).
08/04/20	S. McCandless	0.80	639.20	B190	Communicate with A. Youssefi, A. Ruda, and T. Moyron regarding changes to settlement agreement and related procedures and timing (.40); related review of same (.40).
08/05/20	A. Shiran	0.10	51.45	B190	Review status of settlement revisions.

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20 -ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2321679

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/06/20	A. Shiran	0.60	308.70	B190	Correspondence with counsel for CNA regarding revised settlement agreement (.1) finalize agreement and analyze next steps including court approval (.4) correspondence regarding same with bankruptcy team (.1)
08/06/20	S. Maizel	0.30	240.00	B190	Telephone conference with An Ruda, etc. re CNA settlement issues (x2).
08/06/20	M. Zeefe	0.10	48.03	B190	Email re CNA 9019 motion.
08/07/20	M. Zeefe	2.70	1,296.68	B190	Emails re CNA settlement agreement (0.1); draft 9019 motion to approve same (2.6).
08/07/20	S. McCandless	0.20	159.80	B190	Communicate with M. Zeefe regarding questions as to signature to agreement.
08/07/20	A. Shiran	0.20	102.90	B190	Multiple correspondence with K. Skogstad regarding settlement approval.
08/10/20	S. Martin	0.10	76.08	B190	Communicate with debtors' counsel regarding outreach to Judge Wilson and Judge Robles regarding settlement.
08/10/20	T. Moyron	0.40	239.70	B190	Analyze and prepare comments to notice of settlement (.2); analyze emails from counsel for CNA and prepare email re same (.1); further correspondence regarding filing (.1).
08/10/20	A. Shiran	2.70	1,389.15	B190	Discuss status of 9019 motion with bankruptcy team (.3) review 9019 motion (.3); review local rules relating to notice of settlement to district court (.2) draft notice of settlement to district court (1.1); correspondence relating to same with litigation and bankruptcy teams and incorporated revisions to same (.3); numerous correspondence regarding notice of pending settlement with K. Skogstad and revise notice of pending settlement in conjunction with same (.4) correspondence with counsel for individual defendants regarding notice of pending settlement (.1).
08/10/20	I. Hsu	0.60	267.75	B190	Correspondence re notice of settlement.
08/10/20	S. McCandless	0.30	239.70	B190	Review team and opposing counsel communications regarding finalizing settlement and 9019 Motion.

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20 -ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2321679

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/20	M. Zeefe	4.00	1,921.00	B190	Draft 9019 approving CNA settlement agreement (3.6); call with A. Youssefi re same (0.1); call with N. Koffroth re same (0.1); call with J. Schlant re same (0.1); review draft district court notice re settlement (0.1).
08/11/20	I. Hsu	0.40	178.50	B190	Correspondence re notice of settlement.
08/11/20	K.M. Howard	0.40	100.30	B190	Analysis of Notice of Pending Settlement and reviewed and revised Critical Dates Memorandum.
08/11/20	M. Zeefe	1.00	480.25	B190	Emails re settlement notice and 9019 motion (0.4); draft notice of settlement for bankruptcy court adversary proceeding (0.6).
08/11/20	D. Pina	0.50	159.38	B190	Communications regarding filing of Notice of Pending Settlement regarding CNA v. Verity (.2); finalize and electronically file and distribute notice (.3).
08/12/20	S. Alberts	0.30	240.00	B190	Communicate about CNA settlement agreement.
08/12/20	A. Shiran	1.30	668.85	B190	Review and revise 9019 motion to approve settlement (1.1); correspondence regarding same with bankruptcy team (.2)
08/12/20	K.M. Howard	0.40	100.30	B190	Reviewed the pending settlement agreement and reviewed and revised Critical Dates Memorandum to reflect the deadline for parties to file motions to approve the settlement agreement.
08/12/20	M. Zeefe	0.40	192.10	B190	Revise 9019 motion to approve CNA settlement.
08/13/20	M. Zeefe	0.30	144.08	B190	Emails re 9019 motion to approve CNA settlement.
08/13/20	S. McCandless	0.40	319.60	B190	Review CNA comments on 9019 Motion and settlement agreement (.20); review 9019 Motion in context of same (.20).

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20 -ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2321679

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	M. Zeefe	2.40	1,152.60	B190	Revise and finalize for filing 9019 motion to approve CNA settlement agreement (1.3); calls with N. Koffroth re same (0.2); calls with A. Youssefi re same (0.1); calls with T. Moyron re same (0.7); emails re service of same (0.1).
08/14/20	I. Hsu	0.40	178.50	B190	Correspondence regarding 9019 motion.
08/14/20	S. McCandless	3.00	2,397.00	B190	Review CNA comments for additional changes to 9019 Motion (.10); review 9019 Motion for possible revisions in response to CNA comments (.50); review earlier union agreement in conjunction with language of same (.20); email to team regarding proposed response to CNA (.20); discuss proposed revisions with A. Youssefi (.60); communicate with T. Moyron regarding same (.10); communicate with S. Alberts regarding same (.10); communicate with A. Ruda regarding same (.10); conference call with A. Ruda regarding same (.20); draft and decide language and placement of revision to Motion (with A. Youssefi) (.40); email to team regarding same (.20); communicate with K. Skogstad of CNA regarding Motion (.10); communications with M. Zeefe, T. Moyron, and S. Alberts regarding service on union members (.20).
08/14/20	G. Medina	0.70	205.28	B190	Communication with team regrading filing (0.2); review draft of 9019 Motion (0.2); Review and file Motion to Approve Compromise Under Rule 9019 With Debtors and California Nurses Association (0.3).
08/14/20	S. Alberts	0.40	320.00	B190	Communications about 9019 motion and whether to include resolution of NLRB action (.2) and follow up concerning scope of service (.2).

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20 -ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2321679

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
08/14/20	A. Shiran	2.60	1,337.70	B190	Review proposed revisions to 9019 motion (.4) discuss with Sandy McCandless (.6); numerous correspondence with bankruptcy team regarding revisions to same (.3); revise and update motion and settlement language (.5); correspondence with A. Ruda regarding proposed changes to 9019 motion (.2); revise 9019 motion and assist with finalization of same (.6).
08/15/20	M. Zeefe	0.20	96.05	B190	Emails and calls with T. Moyron re CNA 9019 motion service.
08/16/20	M. Zeefe	0.10	48.03	B190	Emails re CNA members.
08/17/20	K.M. Howard	0.40	100.30	B190	Analysis of Debtors Notice and Motion to Approve Settlement between Debtor and reviewed and revised Critical Dates Memorandum.
08/18/20	K.M. Howard	0.60	150.45	B190	Analysis of Notice of Pending Settlement (.1); analysis of Judge Wilson's minute order vacating all dates (.1); reviewed and revised Critical Dates Memorandum (.4).
08/18/20	M. Zeefe	4.50	2,161.13	B190	Draft application for order shortening time re CNA 9019 and related documents (3.3); emails with team re same (0.1); calls with N. Koffroth re same (0.5); call with T. Moyron re same (0.3); emails with KCC re service re same (0.3).
08/18/20	A. Shiran	0.20	102.90	B190	Multiple correspondence from Kyrsten Skogstad regarding notice of filing of 9019 motion to be provided to district court.
08/18/20	T. Moyron	0.30	179.78	B190	Analyze matters re timing of CNA Settlement (.2); correspond with CNA counsel re filing in District Court (.1).
08/24/20	N. Koffroth	0.40	200.60	B190	Participate in internal call analyzing issues related to settlement
09/02/20	J.A. Moe, II	0.10	59.93	B190	Review E-Mail from Elina Tilman, and review Order Continuing Status Conference From August 18, 2020 To October 13, 2020; exchange E-Mails with Karleen Murphy.
09/03/20	S. Maizel	0.20	160.00	B190	Review and respond to emails re CNA settlement.



Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20 -ap-01051-ER  
Matter: 15800425-000021  
Invoice No.: 2321679

September 30, 2020

Date	Timekeeper	Hours	Amount	Task	Narrative
09/03/20	N. Koffroth	1.60	802.40	B190	Draft CNA insurance claims release
09/03/20	J.A. Moe, II	0.20	119.85	B190	/CNA v. St. Francis et al/ Review Tania Moyron's E-Mail on settlement, then review the Settlement Agreement on terms of the proposed resolution.
09/04/20	M. Zeefe	1.10	528.28	B190	Draft letter to KCC to accompany CNA settlement payment.
	<b>Subtotal</b>	<b>41.40</b>	<b>21,921.28</b>		

Adv. Proceeding - California Nurses association (CAN) v.  
Verity, et al. - 2:20 -ap-01051-ER  
Matter: 15800425-000021  
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September 30, 2020

**SUMMARY OF AMOUNT DUE BY TASK CODE**

<b><u>Task Code</u></b>	<b><u>Task Code Name</u></b>	<b><u>Fees</u></b>	
B190	Other Contested Matters (excl. assumption/rejection motions)	21,921.28	
	Total This Matter		\$21,921.28

**TIME AND FEE SUMMARY**

<b><u>Timekeeper</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>
S. Alberts	\$800.00	0.90	\$720.00
S. Maizel	\$800.00	0.50	\$400.00
S. Martin	\$760.75	0.10	\$76.08
S. McCandless	\$799.00	5.40	\$4,314.60
T. Moyron	\$599.25	0.70	\$419.48
J.A. Moe, II	\$599.25	0.30	\$179.78
M. Zeefe	\$480.25	16.80	\$8,068.23
A. Shiran	\$514.50	10.30	\$5,299.35
N. Koffroth	\$501.50	2.00	\$1,003.00
I. Hsu	\$446.25	1.40	\$624.75
D. Pina	\$318.75	0.50	\$159.38
G. Medina	\$293.25	0.70	\$205.28
K.M. Howard	\$250.75	<u>1.80</u>	<u>\$451.35</u>
Totals		41.40	\$21,921.28

Fee Total \$ 21,921.28

Invoice Total \$ 21,921.28