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Attorneys for the Chapter 11 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.*,

Debtors and Debtors 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
Honorable Ernest M. Robles

**DECLARATION OF PETER CHADWICK IN
SUPPORT OF FINAL APPLICATION OF
DAVIS WRIGHT TREMAINE LLP, AS
DEBTORS' COUNSEL, FOR FEES AND
EXPENSE REIMBURSEMENT FOR THE
PERIOD FEBRUARY 14, 2020 THROUGH
SEPTEMBER 4, 2020; DECLARATION OF
HOPE LEVY-BIEHL**

Date: December 16, 2020
Time: 10:00 a.m.
Place: Courtroom 1568
255 East Temple Street
Los Angeles, California 90012-3300



DECLARATION OF PETER CHADWICK

I, Peter Chadwick, declare, that if called as a witness, I would and could competently testify thereto, of my own personal knowledge, as follows.

1. I am the Chief Financial Officer of Verity Health Systems of California and its affiliated post effective date debtors in this jointly administered chapter 11 case. I make this declaration in support of the *Final Application of Davis Wright Tremaine LLP, as Debtors' Counsel, for Fees and Expense Reimbursement for the Period of February 14, 2020 Through September 4, 2020* [Docket No. 6213] ("Final Application").

2. On August 31, 2018, Verity Health System of California, Inc. ("VHS") and certain of its subsidiaries (collectively the "Debtors") filed voluntary petitions under Chapter 11 of Title 11 of the United States Code.

3. Davis Wright Tremaine LLP ("DWT") has served as special healthcare counsel to Debtors in these jointly administered chapter 11 cases (the "Chapter 11 Cases"), in accordance with the *Order Approving Application of Debtors to Employ Davis Wright Tremaine LLP as Special Healthcare Regulatory Counsel* [Docket No. 4668], authorizing the Debtors to employ DWT as its counsel as of February 14, 2020.

4. I have spent significant amounts of time working with attorneys at DWT on the Chapter 11 Cases. I have been working with and observing DWT's representation of the Debtors for approximately nine months in these Chapter 11 Cases.

5. I have reviewed the DWT Final Application. It is my understanding, from a review of the DWT's Final Application, that DWT requests approval of fees of \$1,011,878.25 and expenses of \$2,967.69 for the period of February 14, 2020 through September 4, 2020, and fees of \$12,665.25 incurred after September 4, 2020 in preparing the Final Application. It is also my understanding that DWT has been paid \$735,758.01 of this amount, and is owed \$291,753.18.

6. I have no objection to DWT's Final Application in regard to the services provided and compensation requested.

1 7. I believe that the fees and expenses incurred by DWT for the entire period from
2 February 14, 2020 through September 4, 2020 are reasonable and appropriate and should be
3 approved by the Court.

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

6 Executed this 20th day of November, 2020 at Washington, D.C.

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PETER CHADWICK