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**UNITED STATES BANKRUPTCY COURT
FOR THE 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 ASC, LLC

Debtors and Debtors In Possession.

Lead Bankruptcy Case No. 2:18-bk-20151-ER
Jointly Administered With:

CASE NO.: 2:18-bk-20162-ER
CASE NO.: 2:18-bk-20163-ER
CASE NO.: 2:18-bk-20164-ER
CASE NO.: 2:18-bk-20165-ER
CASE NO.: 2:18-bk-20167-ER
CASE NO.: 2:18-bk-20168-ER
CASE NO.: 2:18-bk-20169-ER
CASE NO.: 2:18-bk-20171-ER
CASE NO.: 2:18-bk-20172-ER
CASE NO.: 2:18-bk-20173-ER
CASE NO.: 2:18-bk-20175-ER
CASE NO.: 2:18-bk-20176-ER
CASE NO.: 2:18-bk-20178-ER
CASE NO.: 2:18-bk-20179-ER
CASE NO.: 2:18-bk-20180-ER
CASE NO.: 2:18-bk-20181-ER

Chapter 11 Cases
Hon. Judge Ernest M. Robles

**STIPULATION CONTINUING HEARING
AND BRIEFING DEADLINES ON
MOTION FOR ALLOWANCE OF
ADMINISTRATIVE EXPENSE CLAIM
AND REQUEST FOR PAYMENT UNDER
11 U.S.C. § 503(B)**

[RELATES TO DOCKET NO. 6144]

Current Hearing:
Date: December 9, 2020
Time: 10:00 a.m.

Proposed Continued Hearing:
Date: December 16, 2020
Time: 10:00 a.m.
Place: Courtroom 1568
255 E. Temple Street
Los Angeles, CA 90012



182015120112500000000002

STIPULATION

Verity Health System Of California, Inc. (“VHS”) and the above-referenced affiliated post-effective date debtors in the above captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), on the one hand, and Creditor California Physicians’ Service dba Blue Shield of California (“Blue Shield” and, together with the Debtors, the “Parties”), on the other hand, hereby stipulate as follows:

RECITALS

A. On October 2, 2020, Blue Shield filed its *Motion for Allowance of Administrative Expense Claim and Request for Payment under 11 U.S.C. § 503(b)* [Docket No. 6144] (the “Motion”). The Motion is set for hearing on December 9, 2020, at 10:00 a.m. (Pacific Time) before the above-captioned court (the “Court”).

B. Pursuant to the Local Bankruptcy Rules, the deadline to file a response to the Motion is November 25, 2020 (the “Opposition Deadline”), and the deadline for Blue Shield to file a reply in support of the Motion is December 2, 2020 (the “Reply Deadline”).

C. Debtors requested a continuance of the hearing on the Motion. Blue Shield has agreed to this request.

AGREEMENT

NOW, THEREFORE, the Parties to this Stipulation hereby agree and stipulate as follows:

1. The Hearing on the Motion shall be continued from December 9, 2020, at 10:00 a.m. (Pacific Time), to December 16, 2020, at 10:00 a.m. (Pacific Time) or such later time as may be convenient to the Court.

2. The Opposition Deadline shall be continued from November 25, 2020, to December 2, 2020.

3. The Reply Deadline shall be continued from December 2, 2020, to December 9, 2020.

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1 Dated: November 25, 2020

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5 By: /s/ Tania M. Moyron
Tania M. Moyron

6 Counsel for Verity Health Systems of
California, Inc.

7 Dated: November 25, 2020

SNELL & WILMER LLP
MICHAEL B. REYNOLDS
ANDREW B. STILL

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9
10 By: /s/ Michael B. Reynolds¹
Michael B. Reynolds

11 Counsel for Creditor California Physicians'
12 Service dba Blue Shield of California
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26 ¹ Pursuant to the Court's *Amended General Order 20-06* (made applicable by *Amended General*
27 *Order 20-09*), the Debtors (i) are unable to obtain the foregoing party's holographic signature due
28 to a lack of required technology, (ii) obtained the party's permission to sign the document on the
party's behalf, and (iii) will obtain and file the holographic signature required pursuant to LBR
9011-1(a) upon request of the Court. *See Am. General Order 20-06*, at ¶ 8 (Bankr. C.D. Cal. Sep.
11, 2020); *see also Am. General Order 20-09*, at ¶ 2 (Bankr. C.D. Cal. Oct. 9, 2020).