

SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Tel: (213) 623-9300 / Fax: (213) 623-9924

Attorneys for the Post-Effective Date Debtors

**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
ASC, LLC

Post-Effective Date Debtors.

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-20171-ER

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**STIPULATION WITHDRAWING PROOFS OF
CLAIM OF OLD REPUBLIC INSURANCE
COMPANY**



182015120122800000000004

Verity Health System Of California, Inc. as a Post-Effective Date Debtor (“VHS”) and the above-referenced affiliated debtors in the above captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), on the one hand and Old Republic Insurance Company and related affiliates (“Claimant”), on the other hand, hereby stipulate as follows:

RECITALS

1. On August 31, 2018, the Debtors each filed a voluntary petition for relief under chapter 11.

2. In August 2020, the Debtors and the co-plan proponents confirmed a joint Chapter 11 plan [Docket Nos. 5466 and 5504] which became effective on September 4, 2020 [Docket No. 6044]. The VHS Liquidating Trust (the “Liquidating Trust”) was established on the effective date of the confirmed Chapter 11 plan.

3. The Court recently approved the sale of VHS’ shares in its captive insurance company Marillac Insurance Company, Ltd. [Docket Nos. 6271 and 6346].

4. Claimant has agreed to withdraw its proofs of claim set forth below.

AGREEMENT

A. Claimant hereby withdraws Proof of Claim Numbers 4664, 4666, 4669, 4671, 4675, 4676, 4678, 4680, 4681, 4682, 4683, 4684, 4685, 4686, 4687 and 4794 as such claims are identified on the claims register maintained by Kurtzman Carson Consultants LLC as the Debtors’ claims agent.

B. The foregoing shall fully resolve all the Proofs of Claim or any other claims or requests for allowance of Claimant relating to any of the Debtors and the Liquidating Trust.

1 Dated: December 28, 2020

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

4 By: /s/ Tania M. Moyron

TANIA M. MOYRON

5 Attorneys for Post-Effective Date Debtors

6
7 FOX SWIBEL LEVIN & CARROLL LLP.

8 By: /s/ Margaret M. Anderson

MARGARET M. ANDERSON

9
10 Attorneys for Claimant Old Republic Insurance
11 Company and related affiliates

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300