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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

**FOURTH 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, 6384]

Current Hearing:

Date: February 17, 2021

Time: 10:00 a.m.

Proposed Continued Hearing:

Date: March 17, 2021

Time: 10:00 a.m.

Place: Courtroom 1568
255 E. Temple Street
Los Angeles, CA 90012

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
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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”).

B. On November 30, 2020, the Court entered an order [Docket No. 6272] approving the stipulation [Docket No. 6270] between the Parties to continue (i) the deadline to file a response to the Motion to December 2, 2020 (the “Opposition Deadline”), (ii) the deadline for Blue Shield to file a reply in support of the Motion to December 9, 2020 (the “Reply Deadline”), and (iii) the hearing on the Motion to December 16, 2020, at 10:00 a.m. (Pacific Time).

C. On November 30, 2020, the Court entered an order [Docket No. 6274] approving the second stipulation [Docket No. 6273] between the Parties to further continue (i) the Opposition Deadline to January 6, 2021, (ii) the Reply Deadline to January 13, 2021, and (iii) the hearing on the Motion to January 20, 2021, at 10:00 a.m. (Pacific Time).

D. On January 7, 2021, the Court entered an order [Docket No. 6384] approving the third stipulation [Docket No. 6383] between the Parties to further continue (i) the Opposition Deadline to February 3, 2021, (ii) the Reply Deadline to February 10, 2021, and (iii) the hearing on the Motion to February 17, 2021, at 10:00 a.m. (Pacific Time).

E. Debtors requested a further 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 February 17, 2021, at 10:00

1 a.m. (Pacific Time), to March 17, 2021, at 10:00 a.m. (Pacific Time) or such later time as may be
2 convenient to the Court.

3 2. The Opposition Deadline shall be continued from February 3, 2021, to March 3,
4 2021.

5 3. The Reply Deadline shall be continued from February 10, 2021, to March 10,
6 2021.

7 Dated: February 1, 2021

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

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

11 Counsel for Verity Health System of
12 California, Inc.

13 Dated: February 1, 2021

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

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15 By: /s/ Michael B. Reynolds¹
Michael B. Reynolds

16 Counsel for Creditor California Physicians'
17 Service dba Blue Shield of California
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25 _____
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).