

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Samuel R. Maizel (SBN 189301) Tania M. Moyron (SBN 235736) DENTONS US LLP 601 South Figueroa Street, Suite 2500 Los Angeles, CA 90017 Office: (213) 623-9300 Email: samuel.maizel@dentons.com Email: tania.moyron@dentons.com	FOR COURT USE ONLY
<b>UNITED STATES BANKRUPTCY COURT                  CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re: VERITY HEALTH SYSTEM OF CALIFORNIA, INC., et al.   Debtor(s).	CASE NO.: 2:18-bk-20151-ER ADVERSARY NO.: (if applicable) CHAPTER: 11
Plaintiff(s) (if applicable). vs.   Defendant(s) (if applicable).	<b>NOTICE OF APPEAL                  AND STATEMENT OF ELECTION</b>

**Part 1: Identify the appellant(s)**

1. Name(s) of appellant(s): Verity Health System of California, Inc.

2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

For appeals in an adversary proceeding.

- Plaintiff
- Defendant
- Other (*describe*):

For appeals in a bankruptcy case and not in an adversary proceeding.

- Debtor
- Creditor
- Trustee
- Other (*describe*):



**Part 2: Identify the subject of this appeal**

1. Describe the judgment, order, or decree appealed from:  
Interlocutory Order Granting In Part Prime Healthcare Services, Inc.'s Motion to Enforce Asset Purchase Agreement [Docket No. 6691]
2. The date the judgment, order, or decree was entered: 10/21/2021

**Part 3: Identify the other parties to the appeal**

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (*attach additional pages if necessary*):

1. Party: Verity Health System of California, Inc.

Attorney:

Samuel R. Maizel (SBN 189301)  
Tania M. Moyron (SBN 235736)  
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601 South Figueroa Street, Suite 2500  
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DENTONS US LLP  
211 North Broadway, Suite  
St. Louis, MO 63102  
Office: (314) 241-1800

2. Party: Prime Healthcare Services, Inc.

Attorney:

Jason D. Strabo (SBN 246426)  
McDERMOTT WILL & EMERY LLP  
2049 Century Park East, Suite 3200  
Los Angeles, CA 90067  
Office: (310) 788-4125

James W. Kapp, III (admitted pro hac vice)  
McDERMOTT WILL & EMERY LLP  
444 West Lake Street, Suite 4000  
Chicago, Illinois 60606  
Office: (312) 372-2000

**Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

- Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

**Part 5: Sign below**

/s/ Tania M. Moyron

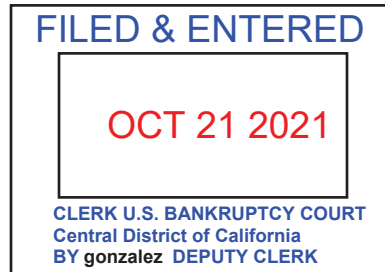
Date: 11/03/2021

Signature of attorney for appellant(s) (or appellant(s)  
if not represented by an attorney)

Fee waiver notice: If appellant is a child support creditor or its representative and appellant has filed the form specified in § 304(g) of the Bankruptcy Reform Act of 1994, no fee is required.

**[Note to inmate filers:** If you are an inmate filer in an institution and you seek the timing benefit of Fed. R. Bankr. P. 8002(c)(1), complete Director's Form 4170 (Declaration of Inmate Filing) and file that declaration along with the Notice of Appeal.]

# **EXHIBIT A**



**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 Medical 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  
Chapter: 11

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.

**INTERLOCUTORY ORDER GRANTING IN PART  
PRIME HEALTHCARE SERVICES, INC.'S  
MOTION TO ENFORCE ASSET PURCHASE  
AGREEMENT**

**[RELATES TO DOC. NO. 6645]**

Date: October 19, 2021  
Time: 10:00 a.m.  
Location: Ctrm. 1568  
Roybal Federal Building  
255 East Temple Street  
Los Angeles, CA 90012

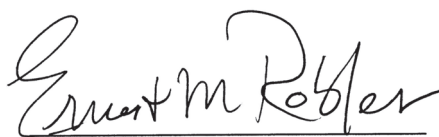
For the reasons set forth in the concurrently-issued *Memorandum of Decision Granting in Part Prime Healthcare Services, Inc.'s Motion to Enforce Asset Purchase Agreement* (the "Memorandum"), the Court **HEREBY ORDERS AS FOLLOWS:**

- 1) Pursuant to the Reconciliation Process,<sup>1</sup> Prime is authorized to retain \$23,157,581 in QAF VI Seller Net Payments.
- 2) No later than **November 19, 2021**, the Liquidating Trustee and Prime shall have completed one day of mediation with respect to the dispute concerning Prime's alleged failure to collect \$5,105,731 in Accounts Receivable.
- 3) To the extent the mediation does not result in a settlement, by no later than **December 3, 2021**, each party shall file a statement setting forth the (a) the issues that remain in dispute and (b) the party's position with respect to each remaining disputed issue.
- 4) A continued hearing on the Motion shall be held on **December 8, 2021 at 10:00 a.m.** Parties may appear at the continued hearing either in-person or by telephone. Parties electing to appear in-person shall comply with all requirements regarding social distancing, use of face masks, etc. which may be in effect at the time of the hearing. Parties electing to appear by telephone should contact CourtCall at 888-882-6878 no later than one hour before the hearing.

IT IS SO ORDERED.

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Date: October 21, 2021



Ernest M. Robles  
United States Bankruptcy Judge

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<sup>1</sup> Capitalized terms not defined herein have the meaning set forth in the Memorandum.