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Attorneys for the Post-Effective Date Debtors

**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-BB

Jointly Administered with:
Case No. 2:18-bk-20162-BB
Case No. 2:18-bk-20163-BB
Case No. 2:18-bk-20164-BB
Case No. 2:18-bk-20165-BB
Case No. 2:18-bk-20167-BB
Case No. 2:18-bk-20168-BB
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Case No. 2:18-bk-20172-BB
Case No. 2:18-bk-20173-BB
Case No. 2:18-bk-20175-BB
Case No. 2:18-bk-20176-BB
Case No. 2:18-bk-20178-BB
Case No. 2:18-bk-20179-BB
Case No. 2:18-bk-20180-BB
Case No. 2:18-bk-20181-BB

Chapter 11 Cases
Hon. Judge Sheri Bluebond

**STIPULATION CONTINUING HEARING
AND BRIEFING DEADLINES ON
MOTION OF CINDY CAMPBELL FOR
RELIEF FROM THE AUTOMATIC STAY
[DOCKET NO. 6795]**

Current Hearing:
Date: January 30, 2024
Time: 10:00 a.m.

Proposed Continued Hearing:
Date: February 20, 2024
Time: 10:00 a.m.
Place: Courtroom 1568
255 East Temple Street
Los Angeles, California 90012



STIPULATION

Verity Health System of California, Inc., and St. Francis Medical Center, post-effective date debtors in the above captioned chapter 11 bankruptcy cases (collectively, the "Debtors"), through their counsel of record, Dentons US LLP, by John A. Moe, II, and Cindy Campbell ("Campbell"), through her counsel of record, The Zalkin Law Firm, P.C., by Daniel Varon, hereby stipulate as follows:

RECITALS

A. On January 5, 2024, Campbell filed a *Motion for Relief from the Automatic Stay* [Docket No. 6795] (the "Motion"). The Motion is currently set for hearing on January 30, 2024, at 10:00 a.m. (Pacific Time) (the "Hearing").

B. Pursuant to the Local Bankruptcy Rules, the deadline to file a response to the Motion is January 16, 2024 (the "Opposition Deadline"), and the deadline for Campbell to file a reply in support of the Motion is January 23, 2024 (the "Reply Deadline").

C. The Debtors requested a continuance of the Hearing on the Motion. Campbell has agreed to this request.

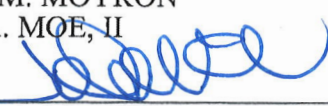
AGREEMENT

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

1. The Hearing on the Motion shall be continued from January 30 to February 20, 2024, 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 January 16 to January 30, 2024.
3. The Reply Deadline shall be continued from January 23 to February 13, 2024.

Dated: January 12, 2024

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON
JOHN A. MOE, II

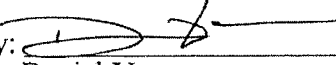
By: 
John A. Moe, II

Counsel for Post-Effective Date Debtors
Verity Health Systems of California, Inc., and
St. Francis Medical Center

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

1 Dated: January 12, 2024

THE ZALKIN LAW FIRM, P.C.
IRWIN ZALKIN
DEVIN M. STOREY
DANIEL VARON

3 By: 
4 Daniel Varon

5 Counsel for Cindy Campbell

DENTONS US LLP
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is Suite 2500, 601 South Figueroa Street, Los Angeles, California 90017-5704.

A true and correct copy of the document entitled (*specify*): STIPULATION CONTINUING HEARING AND BRIEFING DEADLINES ON MOTION OF CINDY CAMPBELL FOR RELIEF FROM THE AUTOMATIC STAY [DOCKET NO. 6795] will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below.

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and Local Rules, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 12, 2024, I checked the CM/ECF docket for this case and determined that the following person/s is/are on the Electronic Mail Notice List to receive NEF transmission including.

Daniel Varon
The Zalkin Law Firm, PC
10590 West Ocean Air Drive, Suite 125
San Diego, CA 92130

Counsel for Cindy Campbell
T: 858 259 3011
E: daniel@zalkin.com

2. SERVED BY UNITED STATES MAIL: On January 12, 2024, I served the following persons and/or entities at the last known addresses in this case by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

3. SERVED BY PERSONAL DELIVERY, NEXT BUSINESS DAY, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling Local Rules, on January 12, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal or next business day delivery to the judge will be completed no later than 12:00 noon after the document is filed.


Honorable Sheri Bluebond
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1652 / Courtroom 1645
Los Angeles, CA 90012

- ☐ Until further notice, on all matters except for evidentiary hearings, no judge's copies are required unless specifically requested by chambers
- ☒ By Messenger w/NEF behind
- ☒ By Next Business Day
- ☐ By Facsimile to _____
- ☐ By Email to mb_chambers@cacb.uscourts.gov

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

January 12, 2024
Date

Frederick Kalve
Printed Name


Signature

SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (Bar No. 235736)
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Attorneys for the Post-Effective Date Debtors

**UNITED STATES BANKRUPTCY COURT
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In re

VERITY HEALTH SYSTEM OF
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Chapter 11 Cases
Hon. Judge Sheri Bluebond

**ORDER APPROVING STIPULATION
CONTINUING HEARING AND BRIEFING
DEADLINES ON MOTION OF CINDY
CAMPBELL FOR RELIEF FROM THE
AUTOMATIC STAY [DOCKET NO. 6795]**

Hearing:

Date: February 20, 2024
Time: 10:00 a.m.
Place: Courtroom 1568
255 East Temple Street
Los Angeles, California 90012

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

The Court, having reviewed the *Stipulation Continuing Hearing and Briefing Deadlines on Motion of Cindy Campbell for Relief from the Automatic Stay [Docket No. 6795]* (the “Stipulation”)¹ entered into by and between Verity Health System of California, Inc., and St. Francis Medical Center, post-effective date debtors in the above captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), and Cindy Campbell (“Campbell”), and good cause appearing therefor,

HEREBY ORDERS AS FOLLOWS:

1. The Stipulation is approved in its entirety.
2. The Hearing on the Motion shall be continued from January 30 to February 20, 2024, at 10:00 a.m. (Pacific Time).
3. The Opposition Deadline shall be continued from January 16 to January 30 , 2024.
4. The Reply Deadline shall be continued from January 23 to February 13, 2024.

IT IS SO ORDERED.

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¹ Unless otherwise defined herein, all capitalized terms have the definitions set forth in the Stipulation.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is Suite 2500, 601 South Figueroa Street, Los Angeles, California 90017-5704.

A true and correct copy of the document entitled (*specify*): ORDER APPROVING STIPULATION CONTINUING HEARING AND BRIEFING DEADLINES ON MOTION OF CINDY CAMPBELL FOR RELIEF FROM THE AUTOMATIC STAY [DOCKET NO. 6795] will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below.

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10590 West Ocean Air Drive, Suite 125
San Diego, CA 92130

Counsel for Cindy Campbell
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Los Angeles, CA 90012

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- ☒ By Messenger w/NEF behind
- ☒ By Next Business Day
- ☐ By Facsimile to _____
- ☐ By Email to mb_chambers@cacb.uscourts.gov

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

January 12, 2024
Date

Frederick Kalve
Printed Name


Signature