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7 **UNITED STATES BANKRUPTCY COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

<p>10 In re:</p> <p>11 BEVERLY COMMUNITY HOSPITAL</p> <p>12 ASSOCIATION, dba BEVERLY</p> <p>13 HOSPITAL (A NONPROFIT PUBLIC</p> <p>14 BENEFIT CORPORATION), <i>et al.</i>¹</p> <p style="text-align: center;">15 Debtors.</p> <hr/> <p>16 <input checked="" type="checkbox"/> Affects all Debtors</p> <p>17 <input type="checkbox"/> Affects Beverly Community Hospital</p> <p>18 Association</p> <p>19 <input type="checkbox"/> Affects Montbello Community Health</p> <p>20 Services, Inc.</p> <p>21 <input type="checkbox"/> Affects Beverly Hospital Foundation</p>	<p>Lead Case No.: 2:23-bk-12359-SK</p> <p>Jointly administered with:</p> <p>Case No: 2:23-bk-12360-SK</p> <p>Case No: 2:23-bk-12361-SK</p> <p>Hon. Sandra R. Klein</p> <p>Chapter 11</p> <p>RESPONSE OF HANMI BANK JOINING</p> <p>IN MASTER TRUSTEE’S (I) RESPONSE</p> <p>TO DEBTORS’ STATEMENT IN</p> <p>RESPONSE TO THE OMNIBUS</p> <p>OBJECTION TO THE USE OF CASH</p> <p>COLLATERAL AND FOR AUTHORITY</p> <p>TO INCUR POST-PETITION</p> <p>FINANCING; AND (II) OBJECTION TO</p> <p>THE DEBTORS’ BIDDING</p> <p>PROCEDURES</p> <p><u>Hearing</u></p> <p>Date: May 31, 2023</p> <p>Time: 8:30 a.m.</p> <p>Place: Courtroom 1639</p> <p style="padding-left: 40px;">255 Temple Street</p> <p style="padding-left: 40px;">Los Angeles, CA</p> <p>Note: This hearing may be conducted</p> <p>remotely using ZoomGov video/audio.</p> <p>Please check the Court’s calendar at:</p> <p>http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/</p>
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28 ¹ The Debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number, are: Beverly Community Hospital Association d/b/a Beverly Health Services, Inc. (3550), and Beverly Hospital Foundation (9685, W. Beverly Blvd., Montebello, California 90640.



1 Secured creditor and depository bank Hanmi Bank (“Hanmi”) hereby submits its Joinder in
2 (1) the *Master Trustee’s Response to Debtors’ Statement in Response to the Omnibus Objection to*
3 *the Use of Cash Collateral and For Authority to Incur Post-Petition Financing* [Docket No. 343];
4 and (2) the *Objection to Debtors’ Bidding Procedures* [Docket No. 337] filed by the Master Trustee
5 (as defined therein) (collectively, the “May 26 Master Trustee Pleadings”).

6 **JOINDER**

7 Hanmi and its counsel have made every effort to avoid being swept up in the increasingly
8 adversarial nature of the Debtors’ cases. Indeed, Hanmi’s counsel proposed the ongoing judicial
9 mediation specifically in an attempt to address the distrust and communication breakdown between
10 the parties.

11 However, Hanmi cannot ignore that it holds a secured claim of more than \$10 million that
12 is entitled to the very rights and benefits that the Master Trustee has been diligently seeking to
13 protect. And Hanmi wholeheartedly agrees that, regardless of any allocation of blame, the terms
14 proposed by the Debtors for the use of cash collateral, DIP financing and bidding procedures suffer
15 from the substantive problems outlined in the May 26 Master Trustee Pleadings.

16 Therefore, Hanmi files this Joinder (as it did on May 22 with respect to the Master Trustee’s
17 objection of the same date) in order to join in the objections and proposed modifications to the relief
18 requested in the Debtors’ underlying motions set forth in the May 26 Master Trustee Pleadings. In
19 doing so, Hanmi does not seek to enflame the already volatile dynamics in these cases. To the
20 contrary, Hanmi and its counsel will continue to work studiously to identify and facilitate
21 opportunities for rapprochement and consensus through the ongoing judicial mediation and
22 otherwise.

23
24 DATED: May 26, 2023

LAW OFFICE OF NATHAN A. SCHULTZ, P.C.

/s/ Nathan A. Schultz

NATHAN A. SCHULTZ

Counsel for Hanmi Bank

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

10621 Craig Road, Traverse City, MI 49686

A true and correct copy of the foregoing document entitled **RESPONSE OF HANMI BANK JOINING IN MASTER TRUSTEE'S (I) RESPONSE TO DEBTORS' STATEMENT IN RESPONSE TO THE OMNIBUS OBJECTION TO THE USE OF CASH COLLATERAL AND FOR AUTHORITY TO INCUR POST-PETITION FINANCING; AND (II) OBJECTION TO THE DEBTORS' BIDDING PROCEDURES** 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 LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On May 26, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On *(date)* _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding 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.

Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on May 22, 2023, 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 delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Sandra R. Klein
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1582 / Courtroom 1575
Los Angeles, CA 90012

Service information continued on attached page

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

May 26, 2023
Date

Nathan A. Schultz
Printed Name

/s/ Nathan A. Schultz
Signature

Electronic Mail Notice List

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