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7 Proposed Attorneys for the Chapter 11 Debtors and
Debtors In Possession

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

10 In re
11 VERITY HEALTH SYSTEM OF
12 CALIFORNIA, INC., *et al.*,
13 Debtors and Debtors In Possession.

Lead Case No. 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

- 14 Affects All Debtors
- 15 Affects Verity Health System of
California, Inc.
- 16 Affects O'Connor Hospital
- 17 Affects Saint Louise Regional Hospital
- 18 Affects St. Francis Medical Center
- 19 Affects St. Vincent Medical Center
- 20 Affects Seton Medical Center
- 21 Affects O'Connor Hospital Foundation
- 22 Affects Saint Louise Regional Hospital
Foundation
- 23 Affects St. Francis Medical Center of
Lynwood Foundation
- 24 Affects St. Vincent Foundation
- 25 Affects St. Vincent Dialysis Center, Inc.
- 26 Affects Seton Medical Center Foundation
- 27 Affects Verity Business Services
- 28 Affects Verity Medical Foundation
- Affects Verity Holdings, LLC
- Affects De Paul Ventures, LLC
- Affects De Paul Ventures - San Jose ASC,
LLC

Chapter 11 Cases

Hon. Judge Ernest M. Robles

**AMENDED NOTICE OF HEARINGS ON
EMERGENCY FIRST-DAY MOTIONS FILED
BY DEBTORS**

Emergency Hearing:

Date: September 5, 2018
Time: 10:00 a.m.
Place: United States Bankruptcy Court
255 East Temple Street
Courtroom 1568
Los Angeles, California 90012
Judge: Hon. Ernest M. Robles

Debtors and Debtors In Possession.

DENTONS US LLP
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LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300



1 **PLEASE TAKE NOTICE** that, on **Wednesday, September 5, 2018, at 10:00 a.m.**, the
2 Court, pursuant to the *Court’s Order Setting Hearing On First Day Motions* [Docket No. 18],
3 attached hereto as Exhibit “1,” will hold first-day hearings (the “Hearings”) on the below-listed
4 Emergency First-Day Motions (the “Motions”) filed by Verity Health System Of California, Inc.
5 (“VHS”) and the above-referenced affiliated debtors, the debtors and debtors in possession in the
6 above-captioned chapter 11 bankruptcy cases (collectively, the “Debtors”), in the above-captioned
7 jointly administered chapter 11 bankruptcy cases. The Hearings will be held at the United States
8 Bankruptcy Court for the Central District of California – Los Angeles Division, in Courtroom
9 1568, located at 225 East Temple Street, Los Angeles CA, 90012.

10 **PLEASE TAKE FURTHER NOTICE** that the Motions, Related Pleadings (identified
11 below), and other papers filed in support of the Motions, will be served upon you on August 31,
12 2018, via either overnight mail, facsimile, personal service, or e-mail. Any parties seeking to
13 obtain additional copies of the Motions, Related Pleadings, and other papers filed in support of
14 the Motions may do so by contacting proposed counsel to the Debtors whose contact information
15 is as follows: Dentons US, LLP, Attn: Tania Moyron, Esq., Email: tania.moyron@dentons.com,
16 Tel: (213) 243-6101; Fax: (213) 623-9924, Address: 601 S. Figueroa St., Suite 2500, Los
17 Angeles, CA 90017.

18 **The Motions That The Court Will Consider Are:**

- 19 • *Emergency Motion for Entry of Order (I) Authorizing the Debtors to (A) Pay Prepetition*
20 *Employee Wages and Salaries, and (B) Pay and Honor Employee Benefits and Other*
21 *Workforce Obligations; and (II) Authorizing and Directing the Applicable Bank to Pay*
22 *All Checks and Electronic Payment Requests Made By the Debtors Relating to the*
23 *Foregoing;*
24 • *Emergency Motion of Debtors for Authority to: (1) Continue Using Existing Cash*
25 *Management System, Bank Accounts and Business Forms; (2) Implement Changes to the*
26 *Cash Management System in the Ordinary Course of Business; (3) Continue*
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- Intercompany Transactions; (4) Provide Administrative Expense Priority for Postpetition Intercompany Claims; and (5) Obtain Related Relief;*
- *Emergency Motion of Debtors for Interim and Final Orders (A) Authorizing the Debtors to Obtain Post Petition Financing (B) Authorizing the Debtors to Use Cash Collateral and (C) Granting Adequate Protection to Prepetition Secured Creditors Pursuant to 11 U.S.C. §§ 105, 363, 364, 1107 and 1108; Memorandum of Points and Authorities in Support Thereof;*
 - *Debtors' Emergency Motion For Entry Of An Order Authorizing Debtors To Honor Prepetition Obligations To Critical Vendors;*
 - *Debtors' Emergency Motion for Order (A) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service and (B) Determining Adequate Assurance of Payment For Future Utility Services;*
 - *Debtors' Emergency Motion: (A) Approving the Debtors Filing a Consolidated List of Fifty Largest General Unsecured Creditors for All Cases; (B) Approving the Debtors Filing a Consolidated Master Mailing Matrix for All Cases; and (C) Permitting the Debtors' Claims and Noticing Agent to Maintain the Master Mailing Matrix;*
 - *Emergency Motion For Entry Of An Order: (I) Authorizing The Debtors To (A) Maintain Insurance Program; (B) Pay Insurance Premiums In The Ordinary Course And (C) Pay All Obligations Associated Therewith; And (Ii) Preventing Insurance Companies From Enforcing Ipso Facto Clauses Or Giving Any Notice Of Termination Or Otherwise Modifying Any Insurance Policy Without Obtaining Relief From The Automatic Stay; and*
 - *Emergency Motion For Entry Of An Order Authorizing The Filing Under Seal Of Confidential Patient Information; and*
 - *Debtors' Emergency Application For An Order (A) Appointing Kurtzman Carson Consultants LLC As Claims And Noticing Agent And (B) Approving The Form And Manner Of Notice Of Case Commencement.*

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The Related Pleadings To The Motions That The Court Will Consider Are:

- *Declaration Of Richard G. Adcock In Support Of First Day Motions;*
- *Declaration of Anita Chou In Support of Cash Collateral Motion; and*
- *Statement Regarding Cash Collateral or Debtor in Possession Financing.*

PLEASE TAKE FURTHER NOTICE that any opposition to the Motions may be presented at Hearings on the Motions.

Dated: August 31, 2018

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

By /s/ Tania M. Moyron
Tania M. Moyron

Proposed Attorneys for the Chapter 11
Debtors and Debtors In Possession

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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re: Verity Health System of California,
Inc., *et al.*,
Debtor and Debtor in Possession.

Lead Case No.: 2:18-bk-20151-ER
Chapter 11

- Affects All Debtors
- Affects Verity Health System of California, Inc.
 Affects O'Connor Hospital
 Affects Saint Louise Regional Hospital
 Affects St. Francis Medical Center
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Medical Foundation
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 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.

Jointly Administered With:
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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.

**ORDER SETTING HEARING ON FIRST DAY
MOTIONS**

Date: September 5, 2018

Time: 10:00 a.m.

Location: Ctrm. 1568
Roybal Federal Building
255 East Temple Street
Los Angeles, CA 90012

On **Wednesday, September 5, 2018, at 10:00 a.m.**, the Court will conduct a hearing on the Debtor's motions to (1) authorize the use of cash collateral, (2) pay prepetition wages, and (3) authorize other appropriate relief (collectively, the "First Day Motions"). Good cause appearing, the Court HEREBY ORDERS as follows:

- 1) By no later than **Friday, August 31, 2018, at 9:00 p.m.**, the Debtor must provide telephonic notice of the hearing on the First Day Motions to the entities asserting an interest in the cash collateral, the secured creditors, the twenty largest unsecured creditors, and the Office of the United States Trustee.
- 2) The First Day Motions must be filed with the Court by no later than **Friday, August 31, 2018**.
- 3) The First Day Motions and a copy of this Order must be served upon the entities asserting an interest in the cash collateral, the secured creditors, the twenty largest unsecured creditors, and the Office of the United States Trustee by no later than **Friday, August 31, 2018**. Service may be accomplished by any of the following methods: (a) personal service, (b) overnight mail, (c) facsimile, or (d) e-mail.
- 4) By no later than **Tuesday, September 4, 2018, at 10:00 a.m.**, the Debtor must file a declaration establishing that service was made in accordance with this Order.
- 5) Any opposition to the First Day Motions may be presented at the hearing.

IT IS SO ORDERED.

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Date: August 31, 2018



Ernest M. Robles
United States Bankruptcy Judge