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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.	CASE NO.: 2:18-bk-20151-ER CHAPTER: 11
Debtor(s).	<p>APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)]</p>

1. Movant applies under LBR 9075-1(b) for an order setting a hearing on shortened notice on the following motion:
 - a. Title of motion: Joint Motion for an Order Approving (I) Proposed Disclosure Statement [...] [Docket No. 4881]
 - b. Date of filing of motion: 6/16/2020

2. Compliance with LBR 9075-1(b)(2)(A): **(The following three sections must be completed):**
 - a. Briefly specify the relief requested in the motion:
 The joint motion (the "Motion") filed by the Debtors and UMB Bank, N.A., as Master Indenture Trustee and Wells Fargo Bank, National Association, as Indenture Trustee, (collectively, the "Movants") seeks entry of an order: (i) approving the Debtors' proposed disclosure statement (the "Disclosure Statement"); (ii) approving the solicitation and voting procedures for the joint amended plan of liquidation (the "Plan") filed by the Debtors, the Debtors' prepetition secured creditors (the "Prepetition Secured Creditors"), and the Official Committee of Unsecured Creditors (the "Committee" and, together with the Debtors and Prepetition Secured Creditors, the "Proponents"); (iii) establishing notice and objection procedures for confirmation of the Plan; and (iv) granting such other and further relief as is necessary. The Motion, Disclosure Statement, and Plan are filed concurrently with this Application.

 The Movants request that the Motion be heard on July 2, 2020, at 10:00 a.m. (Pacific Time), setting the hearing on the Motion on 16 days' notice. The Movants further request that the Court set an opposition deadline of June 23, 2020, which provides 7 days' notice, and a reply deadline of June 29, 2020.



b. Identify the parties affected by the relief requested in the motion:

The Plan effectuates a comprehensive resolution of the Debtors' financial obligations, and therefore the Debtors' secured creditors, unsecured creditors, and other parties in interest are affected by the relief requested in the Motion. However, all major constituents -- the Prepetition Secured Creditors and the Committee -- are co-proponents of the Plan and so there are no significant creditor groups that will be disadvantaged by a shorter period of time to consider the Disclosure Statement or to vote on the Plan. To the contrary, because they have already seen and considered the Plan, and see the value in moving this process along with alacrity, all major constituents support an expedited timeline for consideration of the Disclosure Statement and balloting on the Plan.

c. State the reasons necessitating a hearing on shortened time:

As more fully set forth in the accompanying Declaration of Richard G. Adcock, the Movants request expedited relief for reasons that are well known to the Court and all parties in these chapter 11 cases. First, the process is anticipated to take less time because (a) the major constituents are co-Proponents of the Plan, and (b) the Plan and Disclosure Statement incorporate feedback received on the versions filed in late 2019. Second, the Debtors' estates have historically lost \$450,000 a day, so that every additional day of delay in confirming the Plan decreases creditor recoveries. Third, the Attorney General has scheduled the public meetings on the sales of St. Francis Medical Center and Seton Medical Center in late June and early July, and the Debtors desire to be in a position to close and go effective under the Plan promptly thereafter to minimize further costs and expenses to the estates. Accordingly, expedited relief preserves resources, maximizes the value to creditors under the Plan, and is in the best interests of the Debtors' estates, creditors, and stakeholders.

3. Compliance with LBR 9075-1(b)(2)(B): The attached declaration(s) justifies setting a hearing on shortened notice, and establishes a *prima facie* basis for the granting of the motion.
4. Movant has lodged a proposed Order Setting Hearing on Shortened Notice on mandatory form F 9075-1.1.ORDER .SHORT.NOTICE

Date: 6/16/2020

Dentons US LLP

Printed name of law firm

/s/ Tania M. Moyron

Signature of individual Movant or attorney for Movant

Tania M. Moyron

Printed name of individual Movant or attorney for Movant

DECLARATION OF RICHARD G. ADCOCK

I, Richard G. Adcock, declare, that if called as a witness, I would and could competently testify thereto, of my own personal knowledge, as follows:

1. I am the Chief Executive Officer of Verity Health System of California, Inc. (“VHS”). I became the Debtors’ Chief Executive Officer effective January 2018. Prior thereto, I served as VHS’s Chief Operating Officer since August 2017.

2. Except as otherwise indicated herein, this declaration (the “Declaration”) is based upon my personal knowledge, my review of relevant documents, information provided to me by employees of the Debtors or the Debtors’ legal and financial advisors, or my opinion based upon my experience, knowledge, and information concerning the Debtors’ operations and the healthcare industry. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

3. This Declaration is in support of the *Debtors’ Application for Order Setting Hearing on Shortened Notice* (the “Application”) in regards to the *Joint Motion for an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation And Voting Procedures; (III) Notice And Objection Procedures for Confirmation Of Amended Joint Plan; (IV) Setting Administrative Claims Bar Date; and (V) Granting Related Relief* (the “Motion”) [Docket No. 4881].¹

4. In the Application, the Debtors request that the Motion be heard on shortened notice on July 2, 2020, at 10:00 a.m. (Pacific Time). The Debtors further request that the Court set the opposition deadline on June 23, 2020, and the reply deadline on June 29, 2020, at 12:00 p.m. (Pacific Time).

5. The Debtors submit that expedited relief on the Motion is warranted for reasons that are well known to the Court and all parties in these chapter 11 cases. First, the Debtors anticipate the process to take less time because (a) the major constituents—the Debtors’ prepetition secured creditors and the Official Committee of Unsecured Creditors—are co-proponents of the joint amended plan of liquidation (dated June 16, 2020, the “Plan”), and (b) the Plan and disclosure

¹ All capitalized terms shall have the same meaning as in the Motion, unless otherwise defined herein.

1 statement filed in support thereof (the “Disclosure Statement”) incorporate feedback received on the
2 versions filed in late 2019. Second, the Debtors’ estates have historically lost \$450,000 a day, so
3 that every additional day of delay in confirming the Plan decreases creditor recoveries. Third, the
4 Attorney General for the State of California has scheduled the public meetings on the sales of St.
5 Francis Medical Center and Seton Medical Center in late June and early July, and the Debtors desire
6 to be in a position to close and go effective under the Plan promptly thereafter to minimize further
7 costs and expenses to the estates. Accordingly, the Debtors submit that expedited relief preserves
8 resources and maximizes the value to creditors under the Plan.

9 6. In light of the foregoing, the expedient approval of the Disclosure Statement and Plan
10 process is in the best interests of the Debtors’ estates, creditors, and stakeholders.

11 I declare under penalty of perjury and of the laws in the United States of America, the
12 foregoing is true and correct.

13 Executed this 16th day of June, 2020, at Los Angeles, California.

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16 _____
RICHARD G. ADCOCK

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