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8 Proposed Attorneys for Jacob Nathan Rubin, MD, FACC, Patient Care Ombudsman

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **LOS ANGELES DIVISION**

12 In re:) Lead Case No.: 2:18-bk-20151-ER

13 **VERITY HEALTH SYSTEM OF**
14 **CALIFORNIA, INC. et al.,**

15 Debtor(s).

- 16 Affects All Debtors)
- 17 Affects Verity Health System of)
- 18 California, Inc.)
- 19 Affects O'Connor Hospital)
- 20 Affects Saint Louise Regional Hospital)
- 21 Affects St. Francis Medical Center)
- 22 Affects St. Vincent Medical Center)
- 23 Affects Seton Medical Center)
- 24 Affects O'Connor Hospital Foundation)
- 25 Affects Saint Louise Regional Hospital)
- 26 Foundation)
- 27 Affects St. Francis Medical Center of)
- 28 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)
- Dialysis, LLC)

Chapter 11 Cases

APPLICATION OF PATIENT CARE
OMBUDSMAN TO EMPLOY DR. TIM
STACY DNP, ACNP-BC AS
CONSULTANT EFFECTIVE AS OF
OCTOBER 1, 2018; DECLARATION IN
SUPPORT THEREOF

Date: November 7, 2018

Time: 11:00 a.m.

Ctrm: 1568

255 E. Temple St.
Los Angeles, CA

Debtors and Debtors In Possession



182015118101200000000030

1 Jacob Nathan Rubin, MD, FAAC, the Patient Care Ombudsman (“PCO”) appointed under
2 Section 333 of the Bankruptcy Code in the above-referenced chapter 11 bankruptcy cases of the
3 affected debtors and debtors in possession (collectively, “Debtors”), hereby submits his application
4 (“Application”) for Court approval of his employment of Dr. Tim Stacy DNP, ACNP-BC (“Dr.
5 Stacy”) as a consultant, at the expense of the Debtors’ estates, with compensation determined and
6 paid pursuant to 11 U.S.C. § 330 and orders of this Court, effective as of October 3, 2018, the date
7 of the Notice and Application by the Office of the United States Trustee (“UST”) of and for the
8 appointment of Jacob Nathan Rubin, MD, FAAC as the PCO in the Debtors’ cases. In support of
9 this Application, the PCO hereby alleges as follows:

10 **A. Brief Description Of The Debtors And Their Businesses.**

11 The Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code on
12 August 31, 2018 (“Petition Date”). The Debtors’ cases are being jointly-administered with the
13 Chapter 11 bankruptcy cases filed by their affiliated entities under the lead case of Debtor Verity
14 Health System of California, Inc. (“VHS”). Following the Petition Date, all of the Debtors continue
15 to operate their businesses and manage their affairs as debtors-in-possession pursuant to Section
16 1107 and 1108 of the Bankruptcy Code.

17 According to the Debtors, VHS, a California nonprofit purchase benefit corporation, is the
18 sole corporate member of the following five Debtor California nonprofit public benefit corporations
19 that operate six acute care hospitals, O’Connor Hospital, Saint Louise Regional Hospital, St.
20 Francis Medical Center, St. Vincent Medical Center, Seton Medical Center, and Seton Medical
21 Center Coastside (collectively, “Hospitals”) and other facilities in the state of California. Seton
22 Medical Center and Seton Medical Center Coastside operate under one consolidated acute care
23 license.

24 VHS, the Hospitals, and their affiliated entities operate as a nonprofit health care system in
25 the state of California, with approximately 1,680 inpatient beds, six active emergency rooms, a
26 trauma center, and a host of medical specialties, including tertiary and quaternary care. In 2017, the
27 Hospitals provided medical services to over 50,000 patients and approximately 480,000 outpatients.
28 As of the Petition Date, the Debtors had approximately 850 inpatients.

1 Each of the affected Debtors operates one or more of the Hospitals and/or other medical
2 facilities providing care and services to patients. As a result, each of the Debtors qualifies as a
3 “health care business” as that term is defined in Bankruptcy Code § 101(27)(A). Under the
4 Bankruptcy Abuse Prevention and Consumer Protection Act of 2005, a patient care ombudsman
5 must be appointed in the bankruptcy of a “health care business” to ensure that the medical care
6 provided to patients is not declining or being materially compromised during the bankruptcy.
7 Accordingly, on September 24, 2018, the Debtors and the UST entered into a “*Stipulation For*
8 *Order Directing The Appointment Of A Patient Care Ombudsman Pursuant to 11 U.S.C. § 333*”
9 [docket no. 267] agreeing to the appointment of a PCO in the Debtors’ cases. This Stipulation was
10 approved by an order of the Court entered on September 25, 2018 [docket no. 283].

11 **B. Appointment Of Jacob Nathan Rubin, MD, FAAC As PCO.**

12 Following extensive due diligence and interviews by UST and based on his highly regarded
13 credentials and substantial experience as a licensed medical doctor and in hospital operations and
14 management spanning over 30 years, on October 3, 2018, the UST filed its “*Notice Of Appointment*
15 *Of A Patient Care Ombudsman*” [docket no. 389], and “*Application For Order Approving The*
16 *Appointment Of Patient Care Ombudsman*” [docket no. 390] (“PCO Application”) pursuant to
17 which the UST appointed Jacob Nathan Rubin, MD, FAAC, to serve as the PCO in the Debtors’
18 cases.

19 On October 9, 2018, the Court entered its order approving the PCO Application [docket no.
20 430].

21 **C. The PCO’s Need And Request To Employ Dr. Tim Stacy DNP, ACNP-BC And His**
22 **Qualifications.**

23 The PCO is an individual, and not a business with employees. With less than sixty (60) days
24 to submit his initial report to the Court as to the quality of patient care provided to the thousands of
25 patients at the Debtors’ six (6) active acute care hospitals with emergency rooms, a trauma center,
26 and a host of medical specialty clinics, centers and facilities, the PCO immediately requires the
27 assistance of Dr. Stacy to adequately, efficiently and timely discharge his duties and submit his
28 reports to the Court. In addition to reviewing a variety of hospital and patient records, reports and

1 related information, the PCO intends to, among other things, tour all of the facilities and review the
2 ER, OR, ICU, medical and surgical floors, lab, pharmacy, radiology, and dietary services, and
3 speak to Chief of Staff, key members of senior management, Board of Directors and/or executive
4 committees and certain patients and employees. In short, there is a lot of tasks for the PCO to
5 perform in a short span of time and immediate assistance is needed from Dr. Stacy to fulfill such
6 tasks.

7 Annexed hereto is the Declaration of Dr. Stacy, and his curriculum vitae is attached as
8 **Exhibit 1** to his Declaration. As set forth therein, Dr. Stacy is highly qualified to assist and
9 facilitate the PCO in timely and competently carrying out his duties, and will streamline the PCO's
10 ability to focus on patient care issues. As set forth in his curriculum vitae, Dr. Stacy is a licensed
11 doctor of clinical practice, a Board certified acute care nurse practitioner, and also a clinical
12 professor at UCLA. Based on Dr. Stacy qualifications and experience, his participation and
13 engagement will significantly enhance the PCO's ability and success in focusing and addressing
14 patient care issues at the Debtors' hospitals and facilities.

15 Bankruptcy courts, including courts in this District, routinely authorize patient care
16 ombudsmen to retain professionals. *See, e.g., In re Plaza Healthcare LLC, et al.*, (Bankr. C.D. Cal.
17 Case No. 8:14-bk-11335-CB); *In re Synergy Hematology-Oncology Med. Assocs.*, 433 B.R. 316,
18 318 (Bankr. C.D. Cal. 2009) (holding a PCO could employ counsel to assist in a health care
19 bankruptcy case); *In re Fairfax MRI Ctr.*, (Bankr. C.D. Cal. Case No. 2:07-bk-17992 ER); *In re*
20 *Ehab A. Mohamed Medical Corp., Inc.*, (Bankr. C.D. Cal. Case No. 8:08-bk-18104 GM); *In re*
21 *Kenneth Lawenda OD*, (Bankr. C.D. Cal Case No. 2:08-bk-10796-RN); *Robert W. Hunt, A Medical*
22 *Corp.*, (Bankr. C.D. Cal. Case No.: Case 2:11-bk-58228-ER); *Michael M. Kamrava*, (Bankr. C.D.
23 Cal. Case No. 2:11-bk-62013-TD); *In re Renaissance Surgical Arts At Newport Harbor, LLC*,
24 (Bankr. C.D. Cal. Case No. 8:11-bk-19749-SC); *In re Huntington Pointe Surgery Center LLC*,
25 (Bankr. C.D. Cal. Case No. 8:08-BK-14237-RK); *In re Pacifica of the Valley Corp.*, (Bankr. C.D.
26 Cal. Case No. 1:09-bk-11678-MT); *In re Glen Robert Justice & Jane Grace Justice*, (Bankr. C.D.
27 Cal. Case No. 8:11-bk-26252-CB); *In re OC Neonatal Group Inc.*, (Bankr. C.D. Cal. Case No.
28 8:11-bk-25202-MW); *In re Mendocino Coast Health Care District*, (Bankr. N.D. Cal. Case No.

1 1:12-bk-12753-AJ); *In re Florence Hospital at Anthem*, (Bankr. D. Ariz. Case Nos. 13-03201-
2 BMW and Case No. 2:18-bk-04537-BMW); *In re Gilbert Hospital, LLC*, (Bankr. D. Ariz. Case
3 No.14-bk 01451-MCW and Case No. 4:18-bk-04557-BMW); *In Re Primecare Nevada Inc. dba*
4 *Nye Regional Medical Center*, (Bankr. D. Nev. Case No.: 13-BK20348); *In re Community*
5 *Healthcare of Douglas, Inc.*, (Bankr. D. Ariz. Case No. 4:13-BK01738-BMW); *see also 3 Collier*
6 *on Bankruptcy*, ¶ 333.05[1], at 333-01 (15th ed. rev. 2006) (“If the healthcare business is large or
7 complicated, the ombudsman could be expected to retain professionals to assist in the discharge of
8 the ombudsman’s duties.”).

9 A patient care ombudsman’s duties differ substantially from the interests of any of
10 the parties in interest, such as the debtor or a committee of creditors. Consequently, a patient care
11 ombudsman should not be required to rely on counsel for the Debtor or a committee for legal
12 advice or legal services in carrying out the duties of ombudsman. Thus, in an appropriate case, it is
13 important that a patient care ombudsman have separate legal counsel to advise on the duties under §
14 333 and to assist in presentations to the Court pursuant to the statutory requirements. *See Synergy*,
15 433 B.R. at 319; *see also, In re Renaissance Hosp.-- Grand Prairie, Inc.*, 399 B.R. 442, 448
16 (Bankr. N.D. Tex. 2008) (“As it is doubtful that every suitable candidate for the ombudsman role
17 will possess not only the qualifications necessary to ‘monitor the quality of patient care’ but also
18 the expertise necessary to prepare legal documents and appear in court, it seems clear that Congress
19 must have anticipated that an ombudsman would, on occasion, have to have the assistance of
20 counsel.”)

21 **D. Dr. Stacy’s Disinterestedness And Compensation.**

22 **Disinterestedness.** As set forth in the annexed Declaration of Dr. Stacy, to the best of his
23 knowledge, other than as set forth therein, Dr. Stacy does not hold or represent any interest adverse
24 to the Debtors or the Debtors’ estates, and Dr. Stacy is a “disinterested person” as that term is
25 defined in Section 101(14) of the Bankruptcy Code. Also, other than as set forth in the annexed
26 Declaration of Dr. Stacy, to the best of his knowledge, Dr. Stacy has no prior connection with the
27 Debtors or their estates, the UST or any person employed by the UST.

28 Dr. Stacy is not a creditor, an equity security holder or an insider of the Debtors.

1 Dr. Stacy is not and was not an investment banker for any outstanding security of the
2 Debtors. Dr. Stacy has not been within three (3) years before the petition date an investment banker
3 for a security of the Debtors, or an attorney for such an investment banker in connection with the
4 offer, sale or issuance of any security of the Debtors.

5 Dr. Stacy was not, within two (2) years before the petition date, a director, officer or
6 employee of the Debtors or of any investment banker for any security of the Debtors.

7 Dr. Stacy is not a relative or an employee of the UST or a Bankruptcy Judge.

8 Dr. Stacy has not shared or agreed to share his compensation for assisting the PCO with any
9 other person or entity.

10 As set forth in the annexed Declaration of Dr. Stacy, to the best of his knowledge, Dr. Stacy
11 does not hold or represent any interest materially adverse to the interest of the Debtors' estates or of
12 any class of creditors or equity security holders, by reason of any direct or indirect relationship to,
13 connection with, or interest in, the Debtors or an investment banker for any security of the Debtors,
14 or for any other reason.

15 **Compensation.** Dr. Stacy will seek Court authority to be paid from the Debtors' estates,
16 including, without limitation, interim payments under any monthly fee payment procedures
17 approved by the Court (*i.e.*, "Knudsen Order") for any and all fees incurred and expenses advanced
18 by Dr. Stacy from and after October 3, 2018. Dr. Stacy recognizes that all payments of its earned
19 fees and expenses will be subject to interim and final approval of the Court after notice and a
20 hearing.

21 Dr. Stacy will bill his time for his assistance of the PCO on an hourly billing basis which is
22 \$325 per hour. Dr. Stacy will provide monthly billing statements to the PCO that will set forth the
23 amount of fees incurred and expenses advanced by Dr. Stacy during the previous month. Dr. Stacy
24 will seek reimbursement of expenses in accordance with the rates set forth in the guidelines
25 previously promulgated by the UST. For efficiency purposes, and with their chapter 11 cases
26 jointly administered, Dr. Stacy will bill all of his fees and expenses incurred in his assistance of the
27 PCO to one billing number and request that the fees and expenses be allocated equally amongst the
28 affected Debtors.

1 Dr. Stacy understands the provisions of 11 U.S.C. Section 330 which require, among other
2 things, Court approval of his employment by the PCO as a consultant and of all legal fees and
3 reimbursement of expenses that he will receive from the Debtors and the Debtors' estates.

4 Based on all of the foregoing, the PCO believes that his employment of Dr. Stacy upon the
5 terms and conditions set forth above is fair, reasonable and warranted under the facts and
6 circumstances of the Debtors' cases.

7 **WHEREFORE**, the PCO respectfully requests that the Court enter an order (1) approving
8 this Application, (2) approving the PCO's employment of Dr. Stacy as his consultant, at the
9 expense of the Debtors' estates, and upon the terms and conditions set forth above, effective as of
10 October 3, 2018, and (3) affording such other and further relief as is warranted under the
11 circumstances.

12 Dated: October 11, 2018

JACOB NATHAN RUBIN, PATIENT CARE
OMBUDSMAN.

14 
15 Jacob Nathan Rubin, Patient Care Ombudsman

16 Submitted by:

17 LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

19 By: /s/ Ron Bender

20 RON BENDER
21 MONICA Y. KIM

22 Proposed Attorneys for Patient Care Ombudsman
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1 **DECLARATION OF DR. TIM STACY DNP, ACNP-BC**

2 I, DR. TIM STACY DNP, ACNP-BC, hereby declare as follows:

3 1. I am over 18 years of age. I have personal knowledge of the facts set forth below
4 and, if called to testify, would and could competently testify thereto.

5 2. I make this Declaration in support of the Application to which this Declaration is
6 attached. Unless otherwise stated, all capitalized terms herein have the same meaning as in the
7 Application.

8 3. Jacob Nathan Rubin, MD, FAAC has been appointed to serve as the Patient Care
9 Ombudsman (“PCO”) in the Debtors’ cases. The PCO is an individual, and not a business with
10 employees. With less than sixty (60) days to submit his initial report to the Court as to the quality of
11 patient care provided to the thousands of patients at the Debtors’ six (6) active acute care hospitals
12 with emergency rooms, a trauma center, and a host of medical specialty clinics, centers and
13 facilities, I understand that the PCO immediately requires my assistance to adequately, efficiently
14 and timely discharge his duties and submit his reports to the Court. In addition to reviewing a
15 variety of hospital and patient records, reports and related information, I am informed that the PCO
16 intends to, among other things, tour all of the facilities and review the ER, OR, ICU, medical and
17 surgical floors, lab, pharmacy, radiology, and dietary services, and speak to Chief of Staff, key
18 members of senior management, Board of Directors and/or executive committees and certain
19 patients and employees. In short, there is a lot of tasks for the PCO to perform in a short span of
20 time and immediate assistance is requested from me to fulfill such tasks.

21 4. Attached hereto as **Exhibit 1** is my curriculum vitae. As set forth therein, I am
22 highly qualified to assist and facilitate the PCO in timely and competently carrying out his duties,
23 and will streamline the PCO’s ability to focus on patient care issues. As set forth in my curriculum
24 vitae, I am a licensed doctor of clinical practice, a Board certified acute care nurse practitioner, and
25 also a clinical professor at UCLA. Based on my qualifications and experience, my participation and
26 engagement will significantly enhance the PCO’s ability and success in focusing and addressing
27 patient care issues at the Debtors’ hospitals and facilities.
28

1 5. **Disinterestedness.** To the best of my knowledge, I do not hold or represent any
2 interest adverse to the Debtors or the Debtors' estates, and I am a "disinterested person" as that
3 term is defined in Section 101(14) of the Bankruptcy Code. Also, to the best of my knowledge, I
4 have no prior connection with the Debtors or their estates, the UST or any person employed by the
5 UST.

6 6. I am not a creditor, an equity security holder or an insider of the Debtors.

7 7. I am not and was not an investment banker for any outstanding security of the
8 Debtors. I have not been within three (3) years before the petition date an investment banker for a
9 security of the Debtors, or an attorney for such an investment banker in connection with the offer,
10 sale or issuance of any security of the Debtors.

11 8. I was not, within two (2) years before the petition date, a director, officer or
12 employee of the Debtors or of any investment banker for any security of the Debtors.

13 9. I am not a relative or an employee of the UST or a Bankruptcy Judge.

14 10. I have not shared or agreed to share my compensation for assisting the PCO with any
15 other person or entity.

16 11. To the best of my knowledge, I do not hold or represent any interest materially
17 adverse to the interest of the Debtors' estates or of any class of creditors or equity security holders,
18 by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors or an
19 investment banker for any security of the Debtors, or for any other reason.

20 12. **Compensation.** I will seek Court authority to be paid from the Debtors' estates,
21 including, without limitation, interim payments under any monthly fee payment procedures
22 approved by the Court (*i.e.*, "Knudsen Order") for any and all fees incurred and expenses advanced
23 by me from and after October 3, 2018. I recognize that all payments of its earned fees and expenses
24 will be subject to interim and final approval of the Court after notice and a hearing.

25 13. I will bill my time for my assistance of the PCO on an hourly billing basis which is
26 \$325 per hour. I will provide monthly billing statements to the PCO that will set forth the amount
27 of fees incurred and expenses advanced by me during the previous month. I will seek
28 reimbursement of expenses in accordance with the rates set forth in the guidelines previously

1 promulgated by the UST. For efficiency purposes, and with their chapter 11 cases jointly
2 administered, I will bill all of my fees and expenses incurred in my assistance of the PCO to one
3 billing number and request that the fees and expenses be allocated equally amongst the affected
4 Debtors.

5 14. I understand the provisions of 11 U.S.C. Section 330 which require, among other
6 things, Court approval of my employment by the PCO as a consultant and of all legal fees and
7 reimbursement of expenses that he will receive from the Debtors and the Debtors' estates.

8 Executed on this 11th day of October, 2018, at Los Angeles, California.

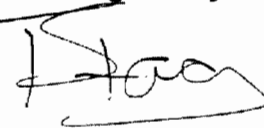
9 **DocuSigned by:**
10 
11 5FB93B1B4D76484
12 DR. TIM STACY DNP, ACNP-BC
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Exhibit 1

Dr. Timothy J Stacy DNP ACNP-BC

Doctor of Clinical Practice
Acute Care Nurse Practitioner- Board Certified
Associate Clinical Professor UCLA
5268 Huckleberry Oak Street
Simi Valley, CA. 93063
Home (805) 578-4569/ Cell (805) 208-0434
tstacy@ucla.edu

EDUCATION:

2010-2013	<u>California State University Fullerton</u> <i>DNP</i> Fullerton, California <i><u>Doctor of Nursing Clinical Practice</u></i>	
2002-2004	<u>University of California Los Angeles</u> <i>MSN</i> Los Angeles, California <i><u>Masters of Science in Nursing</u></i> <i><u>Acute Care Nurse Practitioner Specialty</u></i>	
2000-2002	<u>University of California Los Angeles</u> <i>BS</i> Los Angeles, California <i><u>Bachelor of Science</u></i>	
1992-1994	<u>USC-LAC School of Nursing</u> <i>ASN</i> Los Angeles, California <i><u>Associate in Science</u></i>	
1986-1990	<u>University of Michigan, Ann Arbor</u> <i>BS</i> Ann Arbor, Michigan <i><u>Bachelor of Science</u></i> <i><u>Bio-Chemistry</u></i>	

Professional Certificates:

ACNP Board Certification 2004003450-28

ACLS (Advanced Cardiac Life Support)

PALS (Pediatric Advanced Life Support)

PHN (Public Health Nurse State of California) License Number **66379**

Nurse Practitioner License Number 15005

Registered Nurse License Number 527863

DEA Schedule II-V (on Request)

PROFESSIONAL EXPERIENCE:

2005-current

Sherman Oaks Hospital Sherman Oaks, CA
Nurse Practitioner Hospitalist

Responsible for duties that are accustomed to Hospital Medicine including central line placement, Hemodialysis Catheter Placement, Intubation, Incision and Drainage, Chest tube placement and other minor procedures done at the bedside. Currently established as a Hospitalist with skills that include initial history and physical, admitting orders, daily management, dictation of H/P and Discharge Summary. Assumed full medical staff privileges in 2009. Extremely efficient in medical record content that allows for the highest level of billing through all components of the E/M guidelines with procedure capture.

2004-2006

Mission Community Hospital Panorama City, CA
Nurse Practitioner Hospitalist

Started and developed the role of the Nurse Practitioner Hospitalist at Mission Community Hospital. Medicare length of stay was down 1.7 days and Medical TAR approval rates increased to 87% from 68% due to the NP Hospitalist Program.

2005-current

UCLA School of Nursing Los Angeles, CA
Associate Clinical Professor

Preceptor duties as clinical faculty for the UCLA Hospitalist Residency Program for ACNP Specialty

2004-2007

Kaiser Permanente Woodland Hills, CA
Emergency Medicine Nurse Practitioner

2002-2004

Tarzana Regional Medical Center Tarzana, CA
Emergency Department Director/Manager

Developed standardized nursing triage protocols. Developed and organized physician trained ED nurse education program. Decreased ED length of stay, increased efficiencies, and maintained HPPD budget for 1.5 years running. Earned Tenet growth pillar award in 1/2004. Decreased lab and x-ray TAT. Decreased ED closure by 65% over two years while maintaining a 7% increase in volume. Increased customer satisfaction scores from 65% to 85%. Developed systems to

decrease door to perfusion times from 257 median minutes to 77
median minutes.

1998-2003 UCLA Medical Center Los Angeles, CA
RN Clinical Nurse III ER/Trauma

Earned distinguished UC Humanitarian award 2/2000.

1995-2001 Kaiser Permanente Woodland Hills, CA
RN Emergency Room/Intensive Care Unit

1996-1997 Schaffer Air Ambulance Van Nuys, CA
RN Flight Nurse

1996-1997 Martin Luther King Los Angeles, CA
RN ER/ICU Trauma

Affiliations:

American College of Nurse Practitioners

California Association of Nurse Practitioners

Awards:

UCLA Medical Center Humanitarian Award 2002

NCAA Collegiate All-Big Ten Team (Baseball) 1987-1990

University Service:

2003-Present Suture Lab and Central Line placement Instructor UCLA
School of Nursing Acute Care Nurse Practitioner Program

2004 UCLA Associate Clinical Professor

****REFERENCES AVAILABLE UPON REQUEST***

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:

10250 Constellation Blvd., Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify* **APPLICATION OF PATIENT CARE OMBUDSMAN TO EMPLOY DR. TIM STACY DNP, ACNP-BC AS CONSULTANT EFFECTIVE AS OF OCTOBER 1, 2018; DECLARATION IN SUPPORT THEREOF**) 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 (*date*) October 12, 2018, 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 October 12, 2018, 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 October 12, 2018, 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.

Via Attorney Service
The Honorable Ernest M. Robles
United States Bankruptcy Court, #1560
255 E. Temple Street
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.

October 12, 2018
Date

Jason Klassi
Printed Name

/s/ Jason Klassi
Signature

2:18-bk-20151-ER Notice will be electronically mailed to:

Robert N Amkraut on behalf of Creditor Swinerton Builders
ramkraut@foxrothschild.com

Kyra E Andrassy on behalf of Interested Party Courtesy NEF
kandrassy@swelawfirm.com, csheets@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com

Simon Aron on behalf of Interested Party RCB Equities #1, LLC
saron@wrslawyers.com

Cristina E Bautista on behalf of Creditor Health Net of California, Inc.
cristina.bautista@kattenlaw.com, ecf.lax.docket@kattenlaw.com,nicole.jones@kattenlaw.com

James Cornell Behrens on behalf of Creditor Committee Official Committee of Unsecured Creditors of Verity Health System of California, Inc., et al.
jbehrens@milbank.com,
gbray@milbank.com;mshinderman@milbank.com;hmaghakian@milbank.com;dodonnell@milbank.com;jbrewster@milbank.com;JWeber@milbank.com

James Cornell Behrens on behalf of Creditor Committee Proposed Counsel for the Official Committee of Unsecured Creditors of Verity Health System of California, Inc., et al.
jbehrens@milbank.com,
gbray@milbank.com;mshinderman@milbank.com;hmaghakian@milbank.com;dodonnell@milbank.com;jbrewster@milbank.com;JWeber@milbank.com

Ron Bender on behalf of Health Care Ombudsman J. Nathan Ruben
rb@lnbyb.com

Bruce Bennett on behalf of Creditor Verity MOB Financing II LLC
bbennett@jonesday.com

Bruce Bennett on behalf of Creditor Verity MOB Financing LLC
bbennett@jonesday.com

Peter J Benvenuti on behalf of Creditor County of San Mateo
pbenvenuti@kellerbenvenuti.com, pjbenven74@yahoo.com

Elizabeth Berke-Dreyfuss on behalf of Creditor Center for Dermatology, Cosmetic and Laser Surgery
edreyfuss@wendel.com

Steven M Berman on behalf of Creditor KForce, Inc.
sberman@slk-law.com

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