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7 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

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

11 VERITY HEALTH SYSTEM OF
12 CALIFORNIA, INC., *et al.*,

Jointly Administered With:

13 Debtors and Debtors In Possession.

- 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-20181-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

**STIPULATION CONTINUING REPLY DEADLINE
RELATED TO CONFIRMATION OBJECTION
FILED BY UNITEDHEALTHCARE INSURANCE
COMPANY**

[RELATES TO DOCKET NOS. 4993, 4997, 5302, 5326]

Hearing Date and Time:

Date: August 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: Courtroom 1568
255 E. Temple St.
Los Angeles, CA 90012

Debtors and Debtors In Possession.

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1 **STIPULATION**

2 This stipulation is entered into between Verity Health System Of California, Inc. and the
3 above-referenced affiliated debtors and debtors in possession in the above captioned chapter 11
4 bankruptcy cases (collectively, the “Debtors”), on the one hand, and UnitedHealthcare Insurance
5 Company (collectively, with its affiliates, subsidiaries and parents, “UHC”), on the other.

6 **RECITALS**

7 A. On July 2, 2020, the Debtors filed the *Second Amended Joint Chapter 11 Plan of*
8 *Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and the*
9 *Committee* [Docket No. 4993] (the “Plan”) and related *Disclosure Statement Describing Second*
10 *Amended Joint Chapter 11 Plan of Liquidation (Dated July 2, 2020) of the Debtors, the*
11 *Prepetition Secured Creditors, and the Committee* [Docket No.4994].

12 B. On July 2, 2020, the Court entered the *Order Granting Joint Motion for an Order*
13 *Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting Procedures; (III)*
14 *Notice and Objection Procedures for Confirmation of Amended Joint Plan; (IV) Setting*
15 *Administrative Claims Bar Date; and (V) Granting Related Relief* [Docket No. 4997] (the
16 “Order”), setting the hearing on confirmation of the Plan (the “Confirmation Hearing”) on August
17 12, 2020, at 10:00 a.m. (Pacific Time). *See* Order at 14. The Court also set July 30, 2020, as the
18 deadline to file objections to confirmation of the Plan (the “Objection Deadline”) and August 5,
19 2020, as the deadline to file replies (the “Reply Deadline”) in support of the Plan. *See id.* at 15-
20 16.

21 C. On July 31, 2020, the Court entered an order [Docket No. 5302] approving a
22 stipulation [Docket No. 5285] between the parties to continue the UHC Objection Deadline to
23 August 3, 2020, and continue the Reply Deadline for any objection filed by UHC to August 7,
24 2020.

25 D. On August 3, 2020, UHC filed *UnitedHealthcare Insurance Company’s Objection*
26 *to Confirmation of Joint Chapter 11 Plan of Liquidation of Verity Health System of California*
27 *and its Affiliated Debtors* [Docket No. 5326] (the “Objection”).

28 E. The Parties continue to engage in negotiations concerning the Plan and the

1 Objection, and jointly agree to extend the Reply Deadline to allow additional time to engage in
2 negotiations.

3 **AGREEMENT**

4 NOW, THEREFORE, all of the Parties to this Stipulation hereby stipulate and agree that
5 the Reply Deadline shall be extended from August 7, 2020, to August 9, 2020, with respect to the
6 Objection.

7
8 Dated: August 7, 2020

DENTONS US LLP

9 By: /s/ Tania M. Moyron

Tania M. Moyron

10 Counsel to the Debtors and Debtors in Possession

11
12 Dated: August 7, 2020

LAW OFFICE OF SUSAN I. MONTGOMERY

13
14 By: _____

Susan I. Montgomery

15 Counsel to UnitedHealthcare Insurance Company
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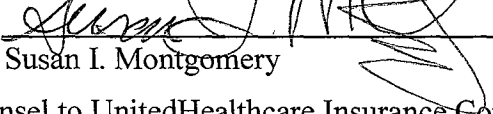
7
8 Dated: August 7, 2020

DENTONS US LLP

9 By: _____
10 Tania M. Moyron
11 Counsel to the Debtors and Debtors in Possession

12 Dated: August 7, 2020

LAW OFFICE OF SUSAN I. MONTGOMERY

13
14 By:  _____
15 Susan I. Montgomery
16 Counsel to UnitedHealthcare Insurance Company

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