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10 *Attorneys for the Chapter 11 Debtors  
and Debtors In Possession*

11 **UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

12 In re:  
13 ASTRIA HEALTH, et al.,  
14 Debtors and Debtors in  
15 Possession.<sup>1</sup>

Chapter 11  
Lead Case No. 19-01189-11  
Jointly Administered

16 **THIRD STIPULATION  
CONTINUING DISCLOSURE  
STATEMENT HEARING AND  
17 DEADLINE TO FILE REPLIES TO  
OBJECTIONS**

18 <sup>1</sup> The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11), Glacier  
19 Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11), Oxbow Summit,  
20 LLC (19-01195-11), SHC Holdco, LLC (19-01196-11), SHC Medical Center - Toppenish (19-  
01190-11), SHC Medical Center - Yakima (19-01192-11), Sunnyside Community Hospital  
21 Association (19-01191-11), Sunnyside Community Hospital Home Medical Supply, LLC (19-  
01197-11), Sunnyside Home Health (19-01198-11), Sunnyside Professional Services, LLC (19-  
01199-11), Yakima Home Care Holdings, LLC (19-01201-11), and Yakima HMA Home Health,  
LLC (19-01200-11).

**STIPULATION CONTINUING  
DISCLOSURE STATEMENT  
HEARING**

DENTONS US LLP BUSH KORNFELD LLP  
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19011892008310000000000007 2110  
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**[RELATED TO DOCKET NOS. 1472, 1473,  
1652, 1694]**

**CONTINUED HEARING:**

**Date/Time: September 24, 2020/11:00 am  
(Pacific)**

**Location: Telephonic or in person at:  
U.S. Bankruptcy Court,  
402 E. Yakima Avenue,  
Second Floor Courtroom  
Yakima, WA 98901**

**Telephone Conference: (877) 402-9757  
Access Code: 7036041**

**STIPULATION CONTINUING  
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1 **STIPULATION**

2 This stipulation (the “Stipulation”) is entered into between Astria Health  
3 (“Astria”), a Washington nonprofit corporation, along with the above-referenced  
4 affiliated debtors (collectively, the “Debtors”), the debtors and debtors in possession  
5 in the above-captioned chapter 11 bankruptcy cases (collectively, the “Chapter 11  
6 Cases”), Lapis Advisers, L.P. (“Lapis”), UMB Bank, N.A. as trustee (“UMB Bank”),  
7 the Official Committee of Unsecured Creditors (the “Committee”) and the United  
8 States Trustee (the “U.S. Trustee,” and together with the Debtors, Lapis, UMB Bank,  
9 and the Committee, the “Parties”).

10 **RECITALS**

11 1. On July 7, 2020, Lapis, UMB and the Debtors (the “Plan Proponents”)  
12 filed the *Joint 11 Chapter Plan of Reorganization of Astria Health and its Debtor*  
13 *Affiliates* [Docket No. 1471] (the “Plan”) as well as the *Disclosure Statement*  
14 *Relating to the Joint Chapter 11 Plan of Reorganization of Astria Health and its*  
15 *Debtor Affiliates* [Docket No. 1472] (the “Disclosure Statement”).

16 2. The Plan Proponents also filed a *Notice of Hearing and Joint Motion for*  
17 *an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting*  
18 *Procedures; (III) Notice and Objection Procedures for Confirmation of Joint Plan of*  
19 *Reorganization; and (IV) Granting Related Relief; Memorandum of Points and*  
20 *Authorities in Support Thereof* [Docket No. 1473], setting a hearing to consider the

21 **STIPULATION CONTINUING  
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1 Disclosure Statement for August 13, 2020, at 11:00 a.m. (the “Disclosure Statement  
2 Hearing”) and August 7, 2020 as the deadline to file relies to any objections to the  
3 Disclosure Statement (the “Reply Deadline”).

4 3. The Plan Proponents only received two objections to the Disclosure  
5 Statement: one filed by the Committee [Docket No. 1624] and the other filed by the  
6 U.S. Trustee [Docket No. 1626].<sup>2</sup>

7 4. On July 28, 2020, the Committee also served certain requests for  
8 production of documents on the Debtors, Lapis and UMB Bank which relate to the  
9 filed Plan and Disclosure Statement (the “Discovery Requests”), which set August  
10 18, 2020 as the deadline to respond to these Discovery Requests  
11 (the “Discovery Reply Deadline”).

12  
13  
14 <sup>2</sup> TIAA Commercial Finance, Inc. filed the *Objection and Joinder of TIAA*  
15 *Commercial Finance, Inc. with Respect to the Debtors' Joint Motion for an Order*  
16 *Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting*  
17 *Procedures; (III) Notice and Objection Procedures for Confirmation of Joint Plan of*  
18 *Reorganization; and (IV) Granting Related Relief* [Docket No. 1625], which merely  
19 joined the objections of other creditors to the Disclosure Statement and reserved the  
20 right to supplement those objections.

21 **STIPULATION CONTINUING  
DISCLOSURE STATEMENT  
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1           5.     On August 11, 2020, the Court entered an *Order Approving Stipulation*  
2 *Continuing Disclosure Statement Hearing and Deadline to File Replies to Objections*  
3 [Docket No. 1652], continuing the Disclosure Statement Hearing to August 19, 2020,  
4 at 11:00 a.m., the Reply Deadline to August 17, 2020, at 12:00 p.m. and the  
5 Discovery Reply Deadline to August 25, 2020.

6           6.     On August 18, 2020, the Court entered an *Order Approving Second*  
7 *Stipulation Continuing Disclosure Statement Hearing and Deadline to File Replies*  
8 *to Objections* [Docket No. 1694], continuing the Disclosure Statement Hearing to  
9 September 2, 2020, at 10:00 a.m., the Reply Deadline to August 31, 2020, at 12:00  
10 p.m. and the Discovery Reply Deadline to September 8, 2020.

11           7.     The Debtors and the Committee have continued discussions regarding a  
12 possible settlement of their disputes and determined that a further continuance of the  
13 Disclosure Statement Hearing will provide the Parties with the best chance to  
14 consensually resolve the objections to the Disclosure Statement. Thus, the Parties  
15 have agreed to continue the Reply Deadline to September 21, 2020, at 12:00 p.m. and  
16 the Disclosure Statement Hearing to September 24, 2020, at 11:00 a.m. The  
17 Committee also agreed to extend the Discovery Reply Deadline to September 29,  
18 2020.

19  
20  
21 **STIPULATION CONTINUING  
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1 **AGREEMENT**

2 **NOW THEREFORE**, the Parties to this Stipulation hereby agree and  
3 stipulate as follows:

4 A. The Reply Deadline is extended from August 31, 2020 to September 21,  
5 2020, at 12:00 p.m.

6 B. The Disclosure Statement Hearing is continued from September 2,  
7 2020, at 10:00 a.m. to September 24, 2020, at 11:00 a.m.

8 C. The Discovery Reply Deadline is extended from September 8, 2020 to  
9 September 29, 2020.

10  
11 *Presented by:*

12 **Astria Health, et al.**

13 By: /s/ Samuel R. Maizel  
14 Samuel R. Maizel  
15 Sam J. Alberts  
16 DENTONS US LLP

17 AND

18 James L. Day  
19 Thomas A. Buford  
20 BUSH KORNFELD LLP  
21 *Counsel to Debtors and Debtors In Possession*

**STIPULATION CONTINUING  
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1 **Lapis Advisers, L.P.**

2 By: /s/ Ryan T. Jareck  
Michael Sirota  
3 Ryan T. Jareck  
COLE SCHOTZ P.C.  
4 *Counsel to Lapis Advisers, L.P.*

5 **UMB Bank, N.A., as trustee and**  
6 **Lapis Advisers, L.P., as agent**

7 By: /s/ William W. Kannel  
William W. Kannel (pro hac vice)  
8 Ian A. Hammel (pro hac vice)  
Timothy J. McKeon (pro hac vice)  
Mintz Levin Cohn Ferris Glovsky & Popeo, P.C.  
9 *Counsel for UMB Bank, N.A., as trustee*  
*and Lapis Advisers, L.P., as agent*

10 **The Official Committee of Unsecured Creditors**

11 By: /s/ Andrew Sherman  
12 Andrew Sherman (pro hac vice)  
Boris Mankovetskiy (pro hac vice)  
13 Sills Cummis & Gross, P.C.  
*Counsel for the Official*  
14 *Committee of Unsecured Creditors*

15 **Office of the United States Trustee**

16 By: /s/ Gary W. Dyer  
Gary W. Dyer  
17 Assistant United States Trustee  
United States Department of Justice

21

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