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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

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

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

Debtor(s).

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

Debtors and Debtors In Possession

) 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-20181-ER

) Chapter 11 Cases

) Hon. Ernest M. Robles

) **STIPULATION FOR ORDER
DIRECTING THE APPOINTMENT OF A
PATIENT CARE OMBUDSMAN
PURSUANT TO 11 U.S.C. § 333**

) NO HEARING REQUIRED]



**TO THE HONORABLE ERNEST M. ROBLES, UNITED STATES BANKRUPTCY JUDGE
FOR THE CENTRAL DISTRICT OF CALIFORNIA, DEBTORS, AND ALL PARTIES IN
INTEREST:**

This Stipulation is made between Debtors Verity Health System of California, Inc., O'Connor Hospital, Saint Louise Regional Hospital, St. Francis Medical Center, St. Vincent Medical Center, Seton Medical Center, St. Vincent Dialysis Center, Inc., Verity Medical Foundation, De Paul Ventures—San Jose Dialysis LLC (collectively, the “Debtors”) and the United States Trustee (“U.S. Trustee”), (collectively, the “Parties”) by and through their respective attorneys of record with reference to the following facts:

RECITALS

1. On August 31, 2018 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).² Since the commencement of their cases, the Debtors have been operating their businesses as debtors in possession pursuant to §§ 1107 and 1108. The Debtors’ cases are jointly administered.

2. The Debtors consist of 6 acute care hospitals and other facilities in the state of California, with approximately 1,680 inpatient beds, six active emergency rooms, a trauma center, eleven medical office buildings, and a host of medical specialties. On the Petition Date, the Debtors had approximately 850 inpatients. Annually, the Debtors provide medical services to over 300,000 patients, both inpatient and outpatient.

3. The Parties, through their respective counsel of record, have conferred regarding this matter and have agreed to stipulate to the appointment of a patient cares ombudsman under § 333.

ACCORDINGLY, IT IS HEREBY STIPULATED THAT:

A. The Debtors are health care businesses as defined under § 101(27A).

B. The Parties stipulate that the appointment of a patient care ombudsman pursuant to 11 U.S.C. § 333 is appropriate under the circumstances.

² All references to “§” or “section” herein are to the Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.*, as amended.

1 C. The Debtors stipulate that they have no objection to such appointment in general
2 based on the characteristics of the Debtors, but they reserve the right to object to the appointment of
3 any particular patient care ombudsman on individualized grounds related to the identity of the
4 individual or entity selected by the United States Trustee, for example on grounds of
5 disinterestedness or lack of applicable skills required to adequately perform the duties of a patient
6 care ombudsman.

7 IT IS SO STIPULATED AND AGREED.

8
9 DATED: 9/24/18

PETER C. ANDERSON
UNITED STATES TRUSTEE

10 
11 By: HATTY YIP
12 Trial Attorney

13 DATED: Sept 20, 2018

VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., et. al.

14 
15 By: SAMUEL MAIZEL
16 Dentons US LLP
17 Proposed Counsel for Debtors in Possession
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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:

915 Wilshire Blvd., Suite 1850, Los Angeles, CA 90017

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION FOR ORDER DIRECTING THE APPOINTMENT OF A PATIENT CARE OMBUDSMAN PURSUANT TO 11 U.S.C. § 333

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) 9/24/18, 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:

SEE ATTACHED LIST

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 9/24/18, 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.

SEE ATTACHED LIST

☒ 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 (date) 9/24/18, 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.

JUDGE'S COPY: [Pursuant to the UST's agreement with the U.S. Bankruptcy Court, Judge's Courtesy Copy was mailed via Federal Express overnight mail to the following address] U.S. Bankruptcy Court, 255 E. Temple St., Room 940, Los Angeles, CA 90012, Attn: Mail Room Clerk—Judges Copies

☐ 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.

9/24/18

Lawrence Pleasant

Date

Printed Name

Signature

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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