

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address A. Jacob Nalbandyan, Esq. (SBN 272023) jnalbandyan@LNtriallawyers.com Tanganica J. Turner, Esq. (SBN 315716) tturner@LNtriallawyers.com LEVIN & NALBANDYAN, LLP 811 Wilshire Blvd, Suite 800 Los Angeles, CA 90017 Tel: (213) 232-4848 Fax: (213) 232-4849 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Jason Shank	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Verity Health System of California, Inc. 2040 E. Mariposa Avenue El Segundo, CA 90245 LOS ANGELES-CA SSN / ITIN: xxx-xx-5 484 Tax ID / EIN: 91-2145484 Debtor(s).	CASE NO.: 2:18-bk-20151-ER CHAPTER: 11 <div style="text-align: center; border: 1px solid black; padding: 5px;"> NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NONBANKRUPTCY FORUM) </div> DATE: 09/23/2019 TIME: 10:00 am COURTROOM: 1568
Movant: Jason Shank	

1. Hearing Location:

- | | |
|--|---|
| <input checked="" type="checkbox"/> 255 East Temple Street, Los Angeles, CA 90012
<input type="checkbox"/> 21041 Burbank Boulevard, Woodland Hills, CA 91367
<input type="checkbox"/> 3420 Twelfth Street, Riverside, CA 92501 | <input type="checkbox"/> 411 West Fourth Street, Santa Ana, CA 92701
<input type="checkbox"/> 1415 State Street, Santa Barbara, CA 93101 |
|--|---|

2. Notice is given to the Debtor and trustee (*if any*)(Responding Parties), their attorneys (*if any*), and other interested parties that on the date and time and in the courtroom stated above, Movant will request that this court enter an order granting relief from the automatic stay as to Debtor and Debtor's bankruptcy estate on the grounds set forth in the attached Motion.
3. To file a response to the motion, you may obtain an approved court form at www.cacb.uscourts.gov/forms for use in preparing your response (optional LBR form F 4001-1.RFS.RESPONSE), or you may prepare your response using the format required by LBR 9004-1 and the Court Manual.



4. When serving a response to the motion, serve a copy of it upon the Movant's attorney (or upon Movant, if the motion was filed by an unrepresented individual) at the address set forth above.
5. If you fail to timely file and serve a written response to the motion, or fail to appear at the hearing, the court may deem such failure as consent to granting of the motion.
6. This motion is being heard on REGULAR NOTICE pursuant to LBR 9013-1(d). If you wish to oppose this motion, you must file and serve a written response to this motion no later than 14 days before the hearing and appear at the hearing.
7. This motion is being heard on SHORTENED NOTICE pursuant to LBR 9075-1(b). If you wish to oppose this motion, you must file and serve a response no later than (*date*) _____ and (*time*) _____; and, you may appear at the hearing.
 - a. An application for order setting hearing on shortened notice was not required (according to the calendaring procedures of the assigned judge).
 - b. An application for order setting hearing on shortened notice was filed and was granted by the court and such motion and order have been or are being served upon the Debtor and upon the trustee (if any).
 - c. An application for order setting hearing on shortened notice was filed and remains pending. After the court rules on that application, you will be served with another notice or an order that specifies the date, time and place of the hearing on the attached motion and the deadline for filing and serving a written opposition to the motion.

Date: 08/29/2019

Levin & Nalbandyan, LLP
Printed name of law firm (if applicable)

Tanganica J. Turner
Printed name of individual Movant or attorney for Movant

/s/Tanganica J. Turner
Signature of individual Movant or attorney for Movant

MOTION FOR RELIEF FROM THE AUTOMATIC STAY AS TO NONBANKRUPTCY ACTION

1. **In the Nonbankruptcy Action, Movant is:**

- a. Plaintiff
- b. Defendant
- c. Other (*specify*):

2. **The Nonbankruptcy Action:** There is a pending lawsuit or administrative proceeding (Nonbankruptcy Action) involving the Debtor or the Debtor's bankruptcy estate:

- a. *Name of Nonbankruptcy Action:*
- b. *Docket number:*
- c. *Nonbankruptcy forum where Nonbankruptcy Action is pending:*
- d. Causes of action or claims for relief (Claims):

3. **Bankruptcy Case History:**

- a. A voluntary An involuntary petition under chapter 7 11 12 13 was filed on (*date*) _____.
- b. An order to convert this case to chapter 7 11 12 13 was entered on (*date*) _____.
- c. A plan was confirmed on (*date*) _____.

4. **Grounds for Relief from Stay:** Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay to proceed with the Nonbankruptcy Action to final judgment in the nonbankruptcy forum for the following reasons:

- a. Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate.
- b. Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- d. The Claims are nondischargeable in nature and can be most expeditiously resolved in the nonbankruptcy forum.
- e. The Claims arise under nonbankruptcy law and can be most expeditiously resolved in the nonbankruptcy forum.

- f. The bankruptcy case was filed in bad faith.
- (1) Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (2) The timing of the filing of the bankruptcy petition indicates that it was intended to delay or interfere with the Nonbankruptcy Action.
- (3) Multiple bankruptcy cases affect the Nonbankruptcy Action.
- (4) The Debtor filed only a few case commencement documents. No schedules or statement of financial affairs (or chapter 13 plan, if appropriate) has been filed.
- g. Other (*specify*):

5. **Grounds for Annulment of Stay.** Movant took postpetition actions against the Debtor.

- a. The actions were taken before Movant knew that the bankruptcy case had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.
- b. Although Movant knew the bankruptcy case was filed, Movant previously obtained relief from stay to proceed in the Nonbankruptcy Action in prior bankruptcy cases affecting the Nonbankruptcy Action as set forth in Exhibit. _____.
- c. Other (*specify*):

6. **Evidence in Support of Motion: (*Important Note: declaration(s) in support of the Motion MUST be signed under penalty of perjury and attached to this motion.*)**

- a. The DECLARATION RE ACTION IN NONBANKRUPTCY FORUM on page 6.
- b. Supplemental declaration(s).
- c. The statements made by Debtor under penalty of perjury concerning Movant's claims as set forth in Debtor's case commencement documents. Authenticated copies of the relevant portions of the Debtor's case commencement documents are attached as Exhibit. _____.
- d. Other evidence (*specify*):

7. **An optional Memorandum of Points and Authorities is attached to this Motion.**

Movant requests the following relief:

1. Relief from the stay pursuant to 11 U.S.C. § 362(d)(1).
2. Movant may proceed under applicable nonbankruptcy law to enforce its remedies to proceed to final judgment in the nonbankruptcy forum, provided that the stay remains in effect with respect to enforcement of any judgment against the Debtor or property of the Debtor's bankruptcy estate.
3. The stay is annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant in the Nonbankruptcy Action shall not constitute a violation of the stay.

4. The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified, or annulled as to the co-debtor, on the same terms and condition as to the Debtor.
5. The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
6. The order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the Nonbankruptcy Action.
7. The order is binding and effective in any future bankruptcy case, no matter who the debtor may be, without further notice
8. Other relief requested.

Date: 08/29/2019

Levin & Nalbandyan LLP

Printed name of law firm (if applicable)

Tanganica J. Turner

Printed name of individual Movant or attorney for Movant

/s/ Tanganica J. Turner

Signature of individual Movant or attorney for Movant

DECLARATION RE ACTION IN NONBANKRUPTCY FORUM

I, (*name of Declarant*) Tanganica J. Turner, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto. I am over 18 years of age. I have knowledge regarding (Nonbankruptcy Action) because:

- I am the Movant.
- I am Movant's attorney of record in the Nonbankruptcy Action.
- I am employed by Movant as (*title and capacity*):
- Other (*specify*):

2. I am one of the custodians of the books, records and files of Movant as to those books, records and files that pertain to the Nonbankruptcy Action. I have personally worked on books, records and files, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Movant on behalf of Movant, which were made at or about the time of the events recorded, and which are maintained in the ordinary course of Movant's business at or near the time of the acts, conditions or events to which they relate. Any such document was prepared in the ordinary course of business of Movant by a person who had personal knowledge of the event being recorded and had or has a business duty to record accurately such event. The business records are available for inspection and copies can be submitted to the court if required.

3. In the Nonbankruptcy Action, Movant is:

- Plaintiff
- Defendant
- Other (*specify*):

4. The Nonbankruptcy Action is pending as:

- a. *Name of Nonbankruptcy Action*:
- b. *Docket number*:
- c. *Nonbankruptcy court or agency where Nonbankruptcy Action is pending*:

5. **Procedural Status of Nonbankruptcy Action:**

a. The Claims are:

- 1. VIOLATION OF CALIFORNIA LABOR CODE SECTION 1102.5*
- 2. WRONGFUL TERMINATION IN VIOLATION OF PUBLIC POLICY*
- 3. LAIBILITY UNDER CAL. GOVT. CODE 12653*

*At tis time, an action has not been filed as Movant is seeking relief from this Court from the current Stay

- b. True and correct copies of the documents filed in the Nonbankruptcy Action are attached as Exhibit _____.
- c. The Nonbankruptcy Action was filed on (*date*) _____.
- d. Trial or hearing began/is scheduled to begin on (*date*) _____.
- e. The trial or hearing is estimated to require _____ days (*specify*).
- f. Other plaintiffs in the Nonbankruptcy Action are (*specify*):

g. Other defendants in the Nonbankruptcy Action are (*specify*):

6. **Grounds for relief from stay:**

- a. Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- b. Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate. The insurance carrier and policy number are (*specify*):

d. The Nonbankruptcy Action can be tried more expeditiously in the nonbankruptcy forum.

(1) It is currently set for trial on (*date*) _____.

(2) It is in advanced stages of discovery and Movant believes that it will be set for trial by (*date*) _____. The basis for this belief is (*specify*):

(3) The Nonbankruptcy Action involves non-debtor parties and a single trial in the nonbankruptcy forum is the most efficient use of judicial resources.

e. The bankruptcy case was filed in bad faith specifically to delay or interfere with the prosecution of the Nonbankruptcy Action.

(1) Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.

(2) The timing of the filing of the bankruptcy petition indicates it was intended to delay or interfere with the Nonbankruptcy Action based upon the following facts (*specify*):

(3) Multiple bankruptcy cases affecting the Property include:

(A) Case name:

Case number:

Chapter:

Date filed:

Date discharged:

Date dismissed:

Relief from stay regarding this Nonbankruptcy Action was was not granted.

(B) Case name:
Case number: Chapter:
Date filed: Date discharged: Date dismissed:
Relief from stay regarding this Nonbankruptcy Action was was not granted.

(C) Case name:
Case number: Chapter:
Date filed: Date discharged: Date dismissed:
Relief from stay regarding this Nonbankruptcy Action was was not granted.

See attached continuation page for information about other bankruptcy cases affecting the Nonbankruptcy Action.

See attached continuation page for additional facts establishing that this case was filed in bad faith.

f. See attached continuation page for other facts justifying relief from stay.

7. Actions taken in the Nonbankruptcy Action after the bankruptcy petition was filed are specified in the attached supplemental declaration(s).

a. These actions were taken before Movant knew the bankruptcy petition had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.

b. Movant knew the bankruptcy case had been filed, but Movant previously obtained relief from stay to proceed with the Nonbankruptcy Action enforcement actions in prior bankruptcy cases affecting the Property as set forth in Exhibit _____

c. For other facts justifying annulment, see attached continuation page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

08/29/2019
Date

Tanganica J. Turnrer
Printed name

/s/Tanganica J. Turner
Signature

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:
811 Wilshire Blvd., Suite 800, Los Angeles, CA 90017

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NONBANKRUPTCY FORUM)** 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)* 08/29/2019, 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 attachment.

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 08/29/2019, 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 attachment.

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)* _____, 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.

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.

08/29/2019 Claudia L. Bautista /s/ Claudia L. Bautista
Date *Printed Name* *Signature*

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24 ***Attorneys for Debtor***

25
26 Verity Claims Processing Center
27 c/o KCC
28 2335 Alaska Avenue
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Claims Administrator

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7 Attorneys for Plaintiff,
8 JASON MICHAEL SHANK

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11

12 In re: VERITY HEALTH SYSTEM OF) Bankruptcy Petition # 2:18-bk-20151-ER
13 CALIFORNIA, INC., et al.;) [*Honorable Ernest M. Robles*]
14)
15)

16) **DECLARATION IN SUPPORT OF MOTION**
17) **FOR RELIEF FROM AUTOMATIC STAY**
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28)



DECLARATION OF TANGANICA J. TURNER

I, Tanganica J. Turner, hereby declare as follows:

1. I am an attorney admitted to practice before the Courts of the State of California, and this Court. I am an associate attorney at the law firm of Levin & Nalbandyan, LLP, attorneys for Jason Michael Shank (“Mr. Shank”).

2. Our firm represents Mr. John Shank in his potential wrongful termination claims against Debtor Verity Health System of California, Inc. (“Debtor”), In re: VERITY HEALTH SYSTEM OF CALIFORNIA, INC., et al.; Bankruptcy Petition # 2:18-bk-20151-ER.

3. Mr. Shank is informed and believes his potential wrongful termination claims arise under nonbankruptcy law and can be most expeditiously resolved in the nonbankruptcy forum.

4. As of the filing on this motion, the nonbankruptcy action has not been filed in the appropriate nonbankruptcy forum, as Movant is seeking relief from this Court from the current Automatic Stay.

5. On or about April 1, 2019, during a phone call between Counsel for Mr. Shank and Counsel for Debtor, it was confirmed that Debtor has in place an Employment Practice Liability Insurance (“EPLI”) policy, with the carrier AIG.

6. As of the filing of this motion, Debtor has not made its policy number or other policy identifying information known to Movant.

7. Mr. Shank is informed and believes that Debtor’s EPLI policy is applicable and covers Mr. Shank’s potential wrongful termination claims against Debtor.

8. To the extent that the Debtor has an insurance policy that will provide coverage for his wrongful termination claims, Mr. Shank will peruse relief under said policy. In the event that the insurance carrier does not provide coverage for damages resulting from Mr. Shank’s wrongful termination claims, declines to extend coverage, or there is no insurance coverage, a separate motion for leave will be filed.

9. Based on the above, Mr. Shank seeks relief from the Automatic Stay currently in place for In re: VERITY HEALTH SYSTEM OF CALIFORNIA, INC., et al.; Bankruptcy Petition # 2:18-bk-20151-ER.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed August 29, 2019, at Los Angeles, California.



Tanganica J. Turner, Esq.

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES
(CASE NO. 2:18-bk-20151-ER)

I am employed in the County of Los Angeles, State of California. I am over the age 18 and not a party to the within action. My business address is 811 Wilshire Boulevard, Suite 800, Los Angeles, CA 90017. On the date stated below, I served the foregoing document(s) described as **DECLARATION IN SUPPORT OF MOTION FOR RELIEF FROM AUTOMATIC STAY** on the interested parties in this action as stated below: **SEE ATTACHED SERVICE LIST.**

XXX BY MAIL. I am “readily familiar” with Levin & Nalbandyan, LLP’s practice for collecting and processing correspondence for mailing with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at Los Angeles, California, on that same day following ordinary business practices.

BY OVERNIGHT DELIVERY. I deposited such document(s) in a box or other facility regularly maintained by the overnight service carrier, or delivered such document(s) to a courier or a driver authorized by the overnight service carrier with delivery fees paid or provided for, addressed to the person(s) being served.


XXX BY CM/ECF. I filed the above referenced document with the Clerk of the United States District Court of Central District of California, using the CM/ECF System. The Court’s CM/ECF System will send an e-mail notification of the foregoing to the following parties and counsel of record who are registered with the Court’s CM/ECF System.

BY FACSIMILE. I caused said document(s) to be transmitted by facsimile. The telephone number of the sending facsimile machine was (213) 232-4849. The facsimile machine I used complied with California Rules of Court 2.301(3). The name(s) and facsimile machine telephone number(s) of the person(s) served are set forth in the service list. The document was transmitted by facsimile transmission, and sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

XXX FEDERAL. I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on August 29, 2019 at Los Angeles, California.

Name: Claudia Bautista

Signature:  _____



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Claims Administrator