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7 *Unsecured Creditors of Verity Health System of*  
8 *California, Inc., et al.*

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

10 In re:  
11 VERITY HEALTH SYSTEM OF CALIFORNIA,  
12 INC., *et al.*,  
13 Debtors and Debtors In Possession.

Lead Case No. 18-20151  
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

- 14 Affects:
- 15  All Debtors
  - 16  Verity Health System of California, Inc.
  - 17  O’Connor Hospital
  - 18  Saint Louise Regional Hospital
  - 19  St. Francis Medical Center
  - 20  St. Vincent Medical Center
  - 21  Seton Medical Center
  - 22  O’Connor Hospital Foundation
  - 23  Saint Louise Regional Hospital
  - 24  Foundation
  - 25  St. Francis Medical Center of
  - 26  Lynwood Foundation
  - 27  St. Vincent Foundation
  - 28  St. Vincent Dialysis Center, Inc.
  - Seton Medical Center Foundation
  - Verity Business Services
  - Verity Medical Foundation
  - Verity Holdings, LLC
  - De Paul Ventures, LLC
  - De Paul Ventures - San Jose Dialysis, LLC

Chapter 11 Cases

Hon. Ernest M. Robles

**STIPULATION BETWEEN VERITY  
MOB FINANCING, LLC AND THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS  
EXTENDING CHALLENGE  
DEADLINE**



1 This stipulation is entered between Verity MOB Financing, LLC (“Verity MOB”), on the one  
2 hand, and the Official Committee of Unsecured Creditors in the above-captioned jointly administered  
3 cases (the “Committee”), on the other, with respect to the following:

4 1. On September 14, 2018, the Committee was formed.

5 2. On October 4, 2018, the Court entered its *Final Order (I) Authorizing Postpetition*  
6 *Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Providing*  
7 *Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying*  
8 *Automatic Stay, and (VI) Granting Related Relief* (the “Final DIP Order”) [Docket No. 409].

9 3. Pursuant to paragraph 5(e) of the Final DIP Order, the Committee has 90 days from  
10 the date of its formation to challenge Prepetition Liens (as defined in the Final DIP Order) asserted  
11 by Verity MOB (the “Original Challenge Deadline”).

12 4. By mutual agreement of Verity MOB and the Committee pursuant to (i) that certain  
13 Stipulation between Verity MOB Financing, LLC and the Official Committee of Unsecured Creditors  
14 Extending Challenge Deadline entered into on December 13, 2018 [Docket No. 1045] (the  
15 “Stipulation”), (ii) that certain Stipulation between Verity MOB Financing, LLC and the Official  
16 Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 11, 2019  
17 [Docket No. 1248], (iii) that certain Stipulation between Verity MOB Financing, LLC and the Official  
18 Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 18, 2019  
19 [Docket No. 1309], (iv) that certain Stipulation between Verity MOB Financing, LLC and the Official  
20 Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 25, 2019  
21 [Docket No. 1389], (v) that certain Stipulation between Verity MOB Financing, LLC and the Official  
22 Committee of Unsecured Creditors Extending Challenge Deadline entered into on or around February  
23 25, 2019 [Docket No. 1626], (vi) that certain Stipulation between Verity MOB Financing, LLC and  
24 the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on or  
25 around March 29, 2019 [Docket No. 1944], (vii) that certain Stipulation between Verity MOB  
26 Financing, LLC and the Official Committee of Unsecured Creditors Extending Challenge Deadline  
27 entered into on or around May 13, 2019 [Docket No. 2363], (viii) that certain Stipulation between  
28 Verity MOB Financing, LLC and the Official Committee of Unsecured Creditors Extending Challenge

1 Deadline entered into on or around May 31, 2019 [Docket No. 2484], (ix) that certain Stipulation  
2 between Verity MOB Financing, LLC and the Official Committee of Unsecured Creditors Extending  
3 Challenge Deadline entered into on or around June 13, 2019 [Docket No. 2548], (x) that certain  
4 Stipulation between Verity MOB Financing, LLC and the Official Committee of Unsecured Creditors  
5 Extending Challenge Deadline entered into on or around June 21, 2019 [Docket No. 2582], and (xi)  
6 that certain Stipulation between Verity MOB Financing, LLC and the Official Committee of  
7 Unsecured Creditors Extending Challenge Deadline entered into on or around June 25, 2019 [Docket  
8 No. 2610], the Original Challenge Deadline was extended to September 6, 2019 (the “Challenge  
9 Deadline”), in each case on the terms set forth therein.

10 NOW, THEREFORE, all of the parties to this stipulation hereby stipulate as follows:

11 The Challenge Deadline shall be extended from September 6, 2019 to October 7, 2019 with  
12 respect to any assets of the Debtors not constituting Acknowledged Collateral (as defined in the  
13 Stipulation). For the avoidance of doubt, nothing herein shall affect, limit or impair any rights, claims  
14 or interests of Verity MOB in any existing or future assets of Debtors whether or not they remain  
15 subject to the extended Challenge Period, including without limitation, any and all rights held under  
16 or in connection with the Loan Documents (as defined in the Stipulation) and the obligations issued  
17 thereunder.

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1 **Verity MOB Financing, LLC**

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3 By: *Ben Rosenblum*  
4 Benjamin Rosenblum *PP WJS*  
5 Jones Day  
6 Counsel to Verity MOB Financing, LLC

7 **Official Committee of Unsecured Creditors**

8 By: *James C. Behrens*  
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13 Counsel to the Official Committee of Unsecured Creditors  
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