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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 II, LLC AND THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS
EXTENDING CHALLENGE
DEADLINE**



1 This stipulation is entered between Verity MOB Financing II, LLC (“Verity MOB II”), on the
2 one hand, and the Official Committee of Unsecured Creditors in the above-captioned jointly
3 administered 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 II (the “Original Challenge Deadline”).

12 4. By mutual agreement of Verity MOB II and the Committee pursuant to (i) that certain
13 Stipulation between Verity MOB Financing II, LLC and the Official Committee of Unsecured
14 Creditors Extending Challenge Deadline entered into on December 13, 2018 [Docket No. 1047] (the
15 “Stipulation”), (ii) that certain Stipulation between Verity MOB Financing II, LLC and the Official
16 Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 11, 2019
17 [Docket No. 1249], (iii) that certain Stipulation between Verity MOB Financing II, LLC and the
18 Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on January 18,
19 2019 [Docket No. 1310], (iv) that certain Stipulation between Verity MOB Financing II, LLC and the
20 Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on January
21 25, 2019 [Docket No. 1390], (v) that certain Stipulation between Verity MOB Financing II, LLC and
22 the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on or
23 around February 25, 2019 [Docket No. 1627], (vi) that certain Stipulation between Verity MOB
24 Financing II, LLC and the Official Committee of Unsecured Creditors Extending Challenge Deadline
25 entered into on or around February 25, 2019 [Docket No. 1945], (vii) that certain Stipulation between
26 Verity MOB Financing II, LLC and the Official Committee of Unsecured Creditors Extending
27 Challenge Deadline entered into on or around May 13, 2019 [Docket No. 2364], (viii) that certain
28 Stipulation between Verity MOB Financing II, LLC and the Official Committee of Unsecured

1 Creditors Extending Challenge Deadline entered into on or around May 31, 2019 [Docket No. 2485],
2 (ix) that certain Stipulation between Verity MOB Financing II, LLC and the Official Committee of
3 Unsecured Creditors Extending Challenge Deadline entered into on or around June 13, 2019 [Docket
4 No. 2549], (x) that certain Stipulation between Verity MOB Financing II, LLC and the Official
5 Committee of Unsecured Creditors Extending Challenge Deadline entered into on or around June 21,
6 2019 [Docket No. 2583], and (x) that certain Stipulation between Verity MOB Financing II, LLC and
7 the Official Committee of Unsecured Creditors Extending Challenge Deadline entered into on or
8 around June 25, 2019 [Docket No. 2611] the Original Challenge Deadline was extended to September
9 6, 2019 (the “Challenge 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 II 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 II, LLC**

2
3 By: *Ben Rosenblum*
4 Benjamin Rosenblum *PP WJS*
5 Jones Day
6 Counsel to Verity MOB Financing II, LLC

7 **Official Committee of Unsecured Creditors**

8 By: *James C. Behrens*
9 Gregory A. Bray
10 Mark Shinderman
11 James C. Behrens
12 Milbank LLP
13 Counsel to the Official Committee of Unsecured Creditors
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