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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.

14 Affects:

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

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

Chapter 11 Cases

Hon. Ernest M. Robles

**OFFICIAL COMMITTEE OF
UNSECURED CREDITORS’ RESPONSE
TO MOTION FOR RELIEF FROM STAY
(NON-BANKRUPTCY FORUM) FILED
BY JASON SHANK [DKT. 2969]**

Hearing:

Date: September 23, 2019
Time: 10:00 a.m.
Location: Courtroom 1568
255 E. Temple St., Los Angeles, CA



1 The Official Committee of Unsecured Creditors of Verity Health System of California, Inc.,
2 *et al.* (the “Committee”) appointed in connection with the chapter 11 cases of the above-captioned
3 debtors and debtors-in-possession (the “Debtors”), hereby submits this response to the *Motion for*
4 *Relief from the Automatic Stay Under 11 U.S.C. § 362 (with supporting declarations) (Action in*
5 *Non-Bankruptcy Forum)* filed by Jason Shank (the “Motion”) [Docket No. 2969].

6 The Committee believes that relief from stay would be premature, especially where the
7 Movant appears not to be limiting his recovery to applicable insurance and not to be waiving
8 deficiency or other claims against the Debtors and the Debtors’ estates. The Committee is concerned
9 that granting relief from stay at this time could negatively impact the Debtors’ bankruptcy cases.

10 The decision of whether to grant relief from stay is committed to the discretion of the
11 bankruptcy judge and may be overturned only upon a showing of abuse of discretion. *In re Sonnax*
12 *Indus., Inc.*, 907 F.2d 1280, 1286 (2d Cir. 1990) (citing cases). Among the factors considered by
13 courts when determining whether “cause” exists to grant relief from stay under 11 U.S.C. §
14 362(d)(1) are “whether the debtor’s insurer has assumed full responsibility for defending,” “lack of
15 any connection with or interference with the bankruptcy case,” “whether the parties are ready for
16 trial in the other proceeding,” and “impact of the stay on the parties and the balance of harms.” *Id.*
17 (citing *In re Curtis*, 40 B.R. 795 (Bankr. D. Utah 1984)); *see also Truebro, Inc. v. Plumberex*
18 *Specialty Prods., Inc. (In re Plumberex Specialty Prods., Inc)*, 311 B.R. 551, 559-60 (Bankr. C.D.
19 Cal. 2004) (adopting the *Curtis* factors).

20 Here, with regard to insurance, paragraph 4.a. of the Motion indicates that the Movant will
21 not seek to limit his recovery to what may be obtained from the Debtors’ insurers. Paragraph 4.a. of
22 the Motion further indicates that the Movant will not waive any deficiency or other claim against the
23 Debtors or property of the Debtors’ bankruptcy estates. To the extent that the Movant seeks to
24 recover from the Debtors and their estates, rather than only from the Debtors’ insurers, this weighs
25 against granting relief from stay at this time. *See Sonnax*, 907 F.2d at 1286.

26 For the reasons set forth above, the Committee respectfully requests that the Court deny the
27 motion but that such denial be made without prejudice.
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DATED: September 9, 2019

MILBANK LLP

/s/ James C. Behrens
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Counsel for the Official Committee of
Unsecured Creditors of Verity Health System of
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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:

2029 Century Park E, 33rd Floor, Los Angeles, CA 90067.

A true and correct copy of the foregoing document entitled (*specify*): OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESPONSE TO MOTION FOR RELIEF FROM STAY (NON-BANKRUPTCY FORUM) FILED BY JASON SHANK 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*) September 9, 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:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) September 9, 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.

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*) September 9, 2019, 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.

September 9, 2019 Ricky Windom
Date Printed Name

/s/ Ricky Windom
Signature

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