

1 GREGORY A. BRAY (Bar No. 115367)
gbray@milbank.com
2 MARK SHINDERMAN (Bar No. 136644)
mshinderman@milbank.com
3 JAMES C. BEHRENS (Bar No. 280365)
jbehrens@milbank.com
4 MILBANK LLP
2029 Century Park East, 33rd Floor
5 Los Angeles, CA 90067
Telephone: (424) 386-4000/Facsimile: (213) 629-5063

6 *Counsel for the Official Committee of*
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 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

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER
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’ (1) OPPOSITION TO THIRD AMENDED SUPPLEMENTAL CASH COLLATERAL STIPULATION; (2) OBJECTION TO THE ORDER THEREON; AND (3) REQUEST FOR HEARING; DECLARATION OF JAMES C. BEHRENS IN SUPPORT THEREOF

[RELATES TO DOCKET NOS. 4184 AND 4187]

Hearing:

Date: TBD

Time: TBD

Location: Courtroom 1568

255 E. Temple St.

Los Angeles, CA 90012



182015120030200000000012

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 (the “Chapter 11 Cases”)
3 of the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby (i) opposes
4 approval of the *Stipulation to (A) Amend the Second Amended Supplemental Cash Collateral Order,*
5 *(B) Authorize Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify*
6 *Automatic Stay, and (E) Grant Related Relief* [Docket No. 4184] (the “Stipulation”); (ii) objects to the
7 *Final Order Approving Stipulation to (A) Amend the Second Amended Supplemental Cash Collateral*
8 *Order, (B) Authorize Continued Use of Cash Collateral, (C) Grant Adequate Protection, (D) Modify*
9 *Automatic Stay, and (E) Grant Related Relief* [Docket No. 4187] (the “Order”); and (iii) requests a
10 hearing before this Court regarding the Stipulation and Order.¹ In support of its opposition, objection,
11 and request for hearing, the Committee respectfully states as follows:

12 **PRELIMINARY STATEMENT**

13 Missing from the Stipulation and Order is any representation that the budget attached to the
14 Stipulation (the “Proposed Budget”) provides for the payment of all allowed administrative claims in
15 full. The Committee is thus concerned that the Prepetition Secured Creditors have agreed to pay some,
16 but not all, of the claims that accrue during the period covered by the Proposed Budget or that
17 otherwise accrue postpetition. Because the Debtors waived the right to surcharge the Prepetition
18 Secured Creditors’ collateral in the Final DIP Order,² it is imperative that the Prepetition Secured
19 Creditors now commit to pay all of the costs and claims incurred by the Debtors postpetition. This is
20 especially true where, as here, the Debtors’ ongoing operations are intended to unlock the going
21 concern value of the Prepetition Secured Creditors’ collateral. But for the Debtors’ continuing efforts,
22 the Prepetition Secured Creditors’ recovery would be severely reduced. The Prepetition Secured
23 Creditors must therefore pay for all of the allowed costs and claims incurred in the Debtors’ efforts to
24 recognize that value.

25
26
27 ¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and/or
the Order.

28 ² *Final Order (A) Authorizing the Debtors to Obtain Post Petition Financing (B) Authorizing the Debtors to Use
Cash Collateral and (C) Granting Adequate Protection to Prepetition Secured Creditors Pursuant to 11 U.S.C. §§
105, 363, 364, 1107 and 1108, dated October 4, 2018 [Docket No. 409].*

1 **ARGUMENT**

2 **1. Administrative Claimants Are Being Put at Risk**

3 Administrative claimants, most if not all of whom are also prepetition unsecured creditors, are
4 being put at risk to extent that the Proposed Budget would not pay their allowed claims. The
5 Prepetition Secured Creditors need the bankruptcy process in order to realize the most value from their
6 collateral, but, if administrative claimants are left unpaid, the Prepetition Secured Creditors will obtain
7 this benefit without paying the freight for the process that yields that value.

8 Because the Debtors waived their section 506, section 552, and marshaling rights, unsecured
9 creditors—and now certain administrative creditors—have been deprived of normal avenues of
10 recovery as the Debtors are liquidating assets for the benefit, in the first instance, of the Prepetition
11 Secured Creditors.³ Accordingly, such waivers by the Debtors make it imperative that the Proposed
12 Budget provide for the payment in full of all allowed administrative costs.

13 It is not enough to contend, as the Debtors presumably will, that allowed administrative claims
14 not covered by the Proposed Budget would be paid as part of plan confirmation because there is no
15 assurance at this time that a plan will be confirmed (although both the Debtors and the Committee
16 strongly support that goal). Once all of the Debtors' assets are liquidated, the Prepetition Secured
17 Creditors could argue that their liens attach to all of the sale proceeds such that no funds at that time
18 would be available to pay allowed administrative claims. Again, because the section 506 and 552
19 waivers eliminate the methods that the Debtors could typically use to address such a situation, it is
20 imperative that provision be made here for the payment of all allowed administrative claims, whether
21 they become allowed during the period covered by the Proposed Budget or otherwise.

22
23
24 ³ See, e.g., *Precision Steel Shearing v. Fremont Fin. Corp. (In re Visual Indus., Inc.)*, 57 F.3d 321, 325 (3d Cir.
25 1995) (section 506(c) “is . . . designed to prevent a windfall to the secured creditor The rule understandably
26 shifts to the secured party . . . the costs of preserving or disposing of the secured party’s collateral, which costs
27 might otherwise be paid from the unencumbered assets of the bankruptcy estate.”); *In re Codesco, Inc.*, 18 B.R.
28 225, 230 (Bankr. S.D.N.Y. 1982) (“The underlying rationale for charging a lienholder with the costs and expenses
of preserving or disposing of the secured collateral is that the general estate and unsecured creditors should not be
required to bear the cost of protecting what is not theirs.”); *In re Proto-Specialties, Inc.*, 43 B.R. 81, 83 (Bankr. D.
Ariz. 1984) (same); *In re Metaldyne Corp.*, 2009 WL 2883045, at *6 (Bankr. S.D.N.Y. June 23, 2009) (holding,
with regard to section 552, “the Court, in its discretion, declines to waive prospectively an argument that other
parties in interest may make.”).

1 **2. Bankruptcy Cases Should Not Be Run Solely for the Benefit of Secured Creditors**

2 Bankruptcy cases should not be run solely for benefit of secured creditors; secured creditors
3 must pay for the benefits of the bankruptcy process. *See In re Def. Drug Stores, Inc.*, 145 B.R. 312,
4 317 (B.A.P. 9th Cir. 1992) (affirming bankruptcy court’s order denying “arrangements that convert
5 the bankruptcy process from one designed to benefit all creditors to one designed for the unwarranted
6 benefit of the postpetition lender”); *In re Tenney Vill. Co., Inc.*, 104 B.R. 562, 568 (Bankr. D.N.H.
7 1989) (declining a debtors’ motion to approve a DIP financing agreement that “would pervert the
8 reorganizational process from one designed to accommodate all classes of creditors and equity
9 interests to one specially crafted for the benefit of the Bank”); *see also* Harvey R. Miller & Shai Y.
10 Waisman, *Is Chapter 11 Bankrupt?*, 47 B.C. L. Rev. 129, 130 (2005) (“The preservation of going-
11 concern values and jobs [have] bec[o]me more important than the enforcement of contractual rights
12 and the liquidation and dismemberment of a debtor’s assets to benefit particular creditors.”)⁴

13 **3. The Debtors Did Not Give the Committee Sufficient Notice**

14 When Committee counsel received drafts of the Stipulation and Order on Friday afternoon,
15 Committee counsel responded an hour later, raising concerns about, among other things,
16 administrative claims going unpaid and the need to have the Prepetition Secured Creditors commit to
17 paying such claims. The Debtors apparently ignored Committee counsel’s concerns and went ahead
18 and filed the Stipulation and lodged the proposed Order a mere half hour later. Notice of the
19 Stipulation and Order was not sufficient, especially because the Committee had made its objection
20 known before the filing.

21 As mandated by the Local Bankruptcy Rules, the Debtors should have set the Stipulation and
22 the Order for hearing and given the Committee an appropriate opportunity to file an opposition and be
23 heard. Local Bankruptcy Rule 9013-1(o) (carving “motions for approval of cash collateral
24 stipulations” out of streamlined “notice and opportunity” process under Rule 9013-1(a)(5)(B) and
25

26 ⁴ The Committee’s current concern about the ongoing payment of administrative claims is similar to its prior
27 complaints about the Final DIP Order and the adequate protection afforded to the Prepetition Secured Creditors
28 thereunder; namely, the Debtors are being permitted to consume unencumbered assets, which would have
otherwise been available for distribution to unsecured creditors, in pursuit of sales that would unlock the value of
the Prepetition Secured Creditors’ collateral (*i.e.*, value over and above what the Prepetition Secured Creditors
would have recognized in foreclosure).

1 requiring full “notice and hearing” process mandated by Rule 9013-1(a)(5)(A.) The Debtors’
2 apparent reliance on Federal Rule of Bankruptcy Procedure 4001(d) for proceeding without notice is
3 misplaced. Under that rule, “[t]he court may direct that . . . the [relevant cash collateral] agreement
4 may be approved without further notice if the court determines that a [prior] motion made pursuant to
5 subdivisions (a), (b), or (c) of this rule was sufficient to afford reasonable notice of the material
6 provisions of the agreement and opportunity for a hearing.” Fed. R. Bank. 4001(d). Here, it is unclear
7 whether the Proposed Budget provides for the payment of all accrued and accruing administrative
8 claims in full. The Debtors can address this concern by representing that all administrative claims
9 whenever arising/allowed would be paid in full.

10 In cases under the Bankruptcy Code, a request for substantive relief that may prejudice other
11 parties must be made by motion, and there must be reasonable notice and opportunity for a hearing.
12 Federal Rule of Bankruptcy Procedure 9014(a) (“[R]elief shall be requested by motion, and reasonable
13 notice and opportunity for hearing shall be afforded the party against whom relief is sought”); *see*
14 Local Bankruptcy Rule 9013-1 (setting forth nature, form, and scope of notice required under specified
15 circumstances in this District).

16 Here the Committee was afforded no due process. The Committee received insufficient notice,
17 its informal objection was apparently ignored, it had no opportunity to formally object, and it was not
18 given the opportunity for a hearing. As articulated by the United States Supreme Court:

19 An elementary and fundamental requirement of due process in any proceeding
20 which is to be accorded finality is notice reasonably calculated, under all the
21 circumstances, to apprise interested parties of the pendency of the action and to
22 afford them an opportunity to present their objections. The notice must be of such
nature as reasonably to convey the required information, . . . and it must afford a
reasonable time for those interested to make their appearance[.]

23 *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 314 (1950) (internal citations omitted); *see*
24 *also Nozzi v. Hous. Auth. of City of Los Angeles*, 806 F.3d 1178, 1194 (9th Cir. 2015) (“To be
25 constitutionally adequate, notice must be “reasonably calculated, under all the circumstances, to
26 apprise interested parties . . . with due regard for the practicalities and particularities of the case.”);
27 *In re Repp*, 307 B.R. 144, 149 (B.A.P. 9th Cir. 2004) (“The key inquiry is whether the method
28 chosen for service is ‘reasonably certain’ to convey the required information and ‘not substantially

1 less likely' to convey notice than other known and feasible methods."); *Lubeck v. Littlefield's*
2 *Restaurant Corporation (In re Fauchier)*, 71 B.R. 212, 216 (B.A.P. 9th Cir. 1987) ("Due process of
3 law mandates notice be given to a creditor whose property rights are being affected so that he may
4 have his day in court.")

5 Accordingly, the Committee requests a hearing on the Stipulation and Order on March 6, 2020
6 or another date that is convenient for this Court, the Debtors, and the Prepetition Secured Creditors.⁵

7 **CONCLUSION**

8 **WHEREFORE**, the Committee requests that the Court either (i) amend the Order to require
9 the payment of all allowed postpetition obligations in full; or (ii) in the alternative, set a hearing on
10 the Stipulation and Order for March 6, 2020, or a date and time that is convenient for this Court and
11 the relevant parties, and permit the Debtors and Prepetition Secured Creditors the opportunity to file
12 written replies; and grant any other relief that the Court determines is just and proper.

13
14 DATED: March 2, 2020

MILBANK LLP

15 /s/ Mark Shinderman
16 GREGORY A. BRAY
17 MARK SHINDERMAN
18 JAMES C. BEHRENS

19 Counsel for the Official Committee of
20 Unsecured Creditors of Verity Health System of
21 California, Inc., et al.

22
23
24
25
26
27 ⁵ The Committee requests March 6 as a hearing date, or a date thereafter, because: (a) Mark Shinderman, counsel for
28 the Committee, will be traveling out of state for other matters from March 2 to 5; (b) the Committee wishes to give
the Debtors and the Prepetition Secured Creditors sufficient time to respond in writing to the Committee's
opposition and objection; and (c) the Committee would like to provide the Debtors and Prepetition Secured
Creditors an opportunity to resolve this matter consensually.

DECLARATION OF JAMES C. BEHRENS

1
2 I, James C. Behrens, submit this declaration in support of the Official Committee of
3 Unsecured Creditors' (i) opposition to the approval of the *Stipulation to (A) Amend the Second*
4 *Amended Supplemental Cash Collateral Order, (B) Authorize Continued Use of Cash Collateral, (C)*
5 *Grant Adequate Protection, (D) Modify Automatic Stay, and (E) Grant Related Relief* [Docket No.
6 4184] (the "Stipulation"); (ii) objection to the *Final Order Approving Stipulation to (A) Amend the*
7 *Second Amended Supplemental Cash Collateral Order, (B) Authorize Continued Use of Cash*
8 *Collateral, (C) Grant Adequate Protection, (D) Modify Automatic Stay, and (E) Grant Related Relief*
9 [Docket No. 4187] (the "Order"); and (iii) request for hearing. I hereby declare as follows:

10 1. I have personal knowledge of the facts stated in this declaration, except as to those
11 stated on information and belief, and, as to those, I am informed and believe them to be true. If
12 called as a witness, I could and would competently testify to the matters stated herein.

13 2. I am an associate attorney at Milbank LLP, at 2029 Century Park East, 33rd Floor,
14 Los Angeles, California 90067, and I am one of the attorneys primarily responsible for representing
15 the Official Committee of Unsecured Creditors of Verity Health System of California, Inc., *et al.*,
16 (the "Committee") appointed in connection with the chapter 11 cases of the above-captioned debtors
17 and debtors-in-possession (the "Debtors") pending in the United States Bankruptcy Court for the
18 Central District of California.

19 3. On Friday, February 28, 2020, at 2:25 p.m. Pacific Time, Nick Koffroth of Dentons
20 US LLP, counsel to the Debtors, emailed drafts of the Stipulation and Order to Committee Counsel.

21 4. Approximately one hour later, at 3:27 p.m., Mark Shinderman of Milbank LLP,
22 counsel to the Committee, sent an email in response, describing multiple concerns that the
23 Committee has with the Stipulation and Order, including that the Committee remains concerned
24 about the Debtors' financial wherewithal to pay all claims accruing post-petition.

25 5. The Debtors filed the Stipulation approximately half an hour later at 4:02 p.m.
26
27
28

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

3 Executed this 2nd day of March, 2020, in Los Angeles, California.

4 
5 James C. Behrens
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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' (1) OPPOSITION TO THIRD AMENDED SUPPLEMENTAL CASH COLLATERAL STIPULATION; (2) OBJECTION TO THE ORDER THEREON; AND (3) REQUEST FOR HEARING; DECLARATION OF JAMES C. BEHRENS IN SUPPORT THEREOF 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*) March 2, 2020, 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*) March 2, 2020, 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*) March 2, 2020, 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.

March 2, 2020
Date

James C. Behrens
Printed Name

/s/ James C. Behrens
Signature

SERVICE LIST

(Via NEF)

- **Alexandra Achamallah** aachamallah@milbank.com, rliubicic@milbank.com
- **Melinda Alonzo** ml7829@att.com
- **Robert N Amkraut** ramkraut@foxrothschild.com
- **Kyra E Andrassy** kandrassy@swelawfirm.com,
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Simon Aron** saron@wrslawyers.com
- **Lauren T Attard** lattard@bakerlaw.com, agrosso@bakerlaw.com
- **Allison R Axenrod** allison@claimsrecoveryllc.com
- **Richard T Baum** rickbaum@hotmail.com, rickbaum@ecf.inforuptcy.com
- **Cristina E Bautista** cristina.bautista@kattenlaw.com, ecf.lax.docket@kattenlaw.com
- **James Cornell Behrens** jbehrens@milbank.com,
gbray@milbank.com;mshinderman@milbank.com;dodonnell@milbank.com;jbrewster@milbank.com;JWeber@
milbank.com
- **Ron Bender** rb@lnbyb.com
- **Bruce Bennett** bbennett@jonesday.com
- **Peter J Benvenuti** pbenvenuti@kellerbenvenuti.com, pjbenven74@yahoo.com
- **Leslie A Berkoff** lberkoff@moritthock.com, hmay@moritthock.com
- **Steven M Berman** sberman@slk-law.com, mceriale@shumaker.com
- **Stephen F Biegenzahn** efile@sfblaw.com
- **Karl E Block** kblock@loeb.com, jvazquez@loeb.com;ladocket@loeb.com;kblock@ecf.courtdrive.com
- **Dustin P Branch** branchd@ballardspahr.com, carolod@ballardspahr.com;hubenb@ballardspahr.com
- **Michael D Breslauer** mbreslauer@swsslw.com,
wyones@swsslw.com;mbreslauer@ecf.courtdrive.com;wyones@ecf.courtdrive.com
- **Chane Buck** cbuck@jonesday.com
- **Lori A Butler** butler.lori@pbgc.gov, efile@pbgc.gov
- **Howard Camhi** hcamhi@ecjlaw.com, tcastelli@ecjlaw.com;amatsuoka@ecjlaw.com
- **Barry A Chatz** barry.chatz@saul.com, jurate.medziak@saul.com
- **Shirley Cho** scho@pszjlaw.com
- **Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
- **Louis J. Cisz** lcisz@nixonpeabody.com, jzic@nixonpeabody.com
- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;olivia@lesliecohenlaw.com
- **Marcus Colabianchi** mcolabianchi@duanemorris.com
- **Kevin Collins** kevin.collins@btlaw.com, Kathleen.lytle@btlaw.com
- **Joseph Corrigan** Bankruptcy2@ironmountain.com
- **David N Crapo** dcrapo@gibbonslaw.com, elrosen@gibbonslaw.com
- **Mariam Danielyan** md@danielyanlawoffice.com, danielyan.mar@gmail.com
- **Brian L Davidoff** b davidoff@greenbergglusker.com,
calendar@greenbergglusker.com;jking@greenbergglusker.com
- **Aaron Davis** aaron.davis@bryancave.com, kat.flaherty@bryancave.com
- **Lauren A Deeb** lauren.deeb@nelsonmullins.com, maria.domingo@nelsonmullins.com
- **Daniel Denny** ddenny@milbank.com
- **Anthony Dutra** adutra@hansonbridgett.com
- **Kevin M Eckhardt** kevin.eckhardt@gmail.com, keckhardt@hunton.com
- **Lei Lei Wang Ekvall** lekvall@swelawfirm.com,
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **David K Eldan** david.eldan@doj.ca.gov, cynthia.gomez@doj.ca.gov
- **Andy J Epstein** taxcpaesq@gmail.com
- **Richard W Esterkin** richard.esterkin@morganlewis.com
- **Christine R Etheridge** christine.etheridge@ikonfin.com
- **M Douglas Flahaut** flahaut.douglas@arentfox.com

- **Michael G Fletcher** mfletcher@frandzel.com, sking@frandzel.com
- **Joseph D Frank** jfrank@fgllp.com, mmatlock@fgllp.com;csmith@fgllp.com;jkleinman@fgllp.com;csucic@fgllp.com
- **William B Freeman** bill.freeman@kattenlaw.com, nicole.jones@kattenlaw.com,ecf.lax.docket@kattenlaw.com
- **John-Patrick M Fritz** jpf@lnbyb.com, JPF.LNBYB@ecf.inforuptcy.com
- **Eric J Fromme** efromme@tocounsel.com, lchapman@tocounsel.com;sschuster@tocounsel.com
- **Amir Gamliel** amir-gamliel-9554@ecf.pacerpro.com, cmallahi@perkinscoie.com;DocketLA@perkinscoie.com
- **Jeffrey K Garfinkle** jgarfinkle@buchalter.com, docket@buchalter.com;dcyrankowski@buchalter.com
- **Thomas M Geher** tmg@jmmb.com, bt@jmmb.com;fc3@jmmb.com;tmg@ecf.inforuptcy.com
- **Lawrence B Gill** lgill@nelsonhardiman.com, rrange@nelsonhardiman.com;ksherry@nelsonhardiman.com;mmarkwell@nelsonhardiman.com
- **Paul R. Glassman** pglassman@sycr.com
- **Matthew A Gold** courts@argopartners.net
- **Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **Marshall F Goldberg** mgoldberg@glassgoldberg.com, jbailey@glassgoldberg.com
- **Richard H Golubow** rgolubow@wcghlaw.com, pj@wcghlaw.com;jmartinez@wcghlaw.com;Meir@virtualparalegalservices.com
- **David M. Guess** guessd@gtlaw.com
- **Anna Gumport** agumport@sidley.com
- **Melissa T Harris** harris.melissa@pbgc.gov, efile@pbgc.gov
- **James A Hayes** jhayes@zinserhayes.com, jhayes@jamesahayesapl.com
- **Michael S Held** mheld@jw.com
- **Lawrence J Hilton** lhilton@onellp.com, lthomas@onellp.com,info@onellp.com,rgolder@onellp.com,lhyska@onellp.com,nlichtenberger@onellp.com
- **Robert M Hirsh** rhirsh@lowenstein.com
- **Florice Hoffman** fhoffman@socal.rr.com, floricehoffman@gmail.com
- **Lee F Hoffman** leehoffmanjd@gmail.com, lee@fademlaw.com
- **Michael Hogue** hogue@gtlaw.com, SFOLitDock@gtlaw.com;navarrom@gtlaw.com
- **Matthew B Holbrook** mholbrook@sheppardmullin.com, mmanns@sheppardmullin.com,amartin@sheppardmullin.com
- **David I Horowitz** david.horowitz@kirkland.com, keith.catuara@kirkland.com;terry.ellis@kirkland.com;elsa.banuelos@kirkland.com;ivon.granados@kirkland.com
- **Virginia Hoyt** scif.legal.bk@scif.com
- **Brian D Huben** hubenb@ballardspahr.com, carolod@ballardspahr.com
- **Joan Huh** joan.huh@cdtfa.ca.gov
- **Benjamin Ikuta** bikuta@hml.law
- **Lawrence A Jacobson** laj@cohenandjacobson.com
- **John Mark Jennings** johnmark.jennings@kutakrock.com, mary.clark@kutakrock.com
- **Monique D Jewett-Brewster** mjb@hopkinscarley.com, eamaro@hopkinscarley.com
- **Crystal Johnson** M46380@ATT.COM
- **Gregory R Jones** gjones@mwe.com, rnhunter@mwe.com
- **Jeff D Kahane** jkahane@duanemorris.com, dmartinez@duanemorris.com
- **Steven J Kahn** skahn@pszyjw.com
- **Cameo M Kaisler** salembier.cameo@pbgc.gov, efile@pbgc.gov
- **Ivan L Kallick** ikallick@manatt.com, ihernandez@manatt.com
- **Ori Katz** okatz@sheppardmullin.com, cshulman@sheppardmullin.com;ezisholtz@sheppardmullin.com;lsegura@sheppardmullin.com
- **Payam Khodadadi** pkhodadadi@mcguirewoods.com, dkiker@mcguirewoods.com
- **Christian T Kim** ckim@dumas-law.com, ckim@ecf.inforuptcy.com
- **Jane Kim** jkim@kellerbenvenuti.com
- **Monica Y Kim** myk@lnbrb.com, myk@ecf.inforuptcy.com

- **Gary E Klausner** gek@lnbyb.com
- **David A Klein** david.klein@kirkland.com
- **Nicholas A Koffroth** nick.koffroth@dentons.com, chris.omeara@dentons.com
- **Joseph A Kohanski** jkohanski@bushgottlieb.com, kprestegard@bushgottlieb.com
- **David S Kupetz** dkupetz@sulmeyerlaw.com, dperez@sulmeyerlaw.com;dperez@ecf.courtdrive.com;dkupetz@ecf.courtdrive.com
- **Jeffrey S Kwong** jsk@lnbyb.com, jsk@ecf.inforuptcy.com
- **Darryl S Laddin** bkrfilings@agg.com
- **Robert S Lampl** advocate45@aol.com, rlisarobinsonr@aol.com
- **Richard A Lapping** richard@lappinglegal.com
- **Paul J Laurin** plaurin@btlaw.com, slmoore@btlaw.com;jboustani@btlaw.com
- **Nathaniel M Leeds** nathaniel@mitchelllawsf.com, sam@mitchelllawsf.com
- **David E Lemke** david.lemke@wallerlaw.com, chris.cronk@wallerlaw.com;Melissa.jones@wallerlaw.com;cathy.thomas@wallerlaw.com
- **Lisa Lenherr** llenherr@wendel.com, bankruptcy@wendel.com
- **Elan S Levey** elan.levy@usdoj.gov, tiffany.davenport@usdoj.gov,louisa.lin@usdoj.gov
- **Kerri A Lyman** klyman@mwe.com, lbates@mwe.com
- **Tracy L Mainguy** bankruptcycourtnotices@unioncounsel.net, tmainguy@unioncounsel.net
- **Samuel R Maizel** samuel.maizel@dentons.com, alicia.aguilar@dentons.com;docket.general.lit.LOS@dentons.com;tania.moyron@dentons.com;kathryn.howard@dentons.com;joan.mack@dentons.com;derry.kalve@dentons.com
- **Alvin Mar** alvin.mar@usdoj.gov, dare.law@usdoj.gov
- **Craig G Margulies** Craig@MarguliesFaithlaw.com, Vicky@MarguliesFaithlaw.com;Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithlaw.com
- **Hutchison B Meltzer** hutchison.meltzer@doj.ca.gov, Alicia.Berry@doj.ca.gov
- **John J Menchaca (TR)** jmenchaca@menchacacpa.com, ca87@ecfcbis.com;igaeta@menchacacpa.com
- **Christopher Minier** becky@ringstadlaw.com, arlene@ringstadlaw.com
- **John A Moe** john.moe@dentons.com, glenda.spratt@dentons.com
- **Susan I Montgomery** susan@simontgomerylaw.com, assistant@simontgomerylaw.com;simontgomerylawecf.com@gmail.com;montgomerysr71631@notify.bestcase.com
- **Monserrat Morales** Monsi@MarguliesFaithLaw.com, Vicky@MarguliesFaithLaw.com;Helen@marguliesfaithlaw.com;Angela@MarguliesFaithlaw.com
- **Kevin H Morse** kmorse@clarkhill.com, blambert@clarkhill.com
- **Marianne S Mortimer** mmartin@jmbm.com
- **Tania M Moyron** tania.moyron@dentons.com, chris.omeara@dentons.com;nick.koffroth@dentons.com;Sonia.martin@dentons.com;Isabella.hsu@dentons.com;l ee.whidden@dentons.com;Jacqueline.whipple@dentons.com
- **Alan I Nahmias** anahmias@mbnlawyers.com, jdale@mbnlawyers.com
- **Akop J Nalbandyan** jnalbandyan@LNtriallawyers.com, cbautista@LNtriallawyers.com
- **Jennifer L Nassiri** jennifernassiri@quinnemanuel.com
- **Charles E Nelson** nelsonc@ballardspahr.com, wassweilerw@ballardspahr.com
- **Sheila Gropper Nelson** shedoesbklaw@aol.com
- **Mark A Neubauer** mneubauer@carltonfields.com, mlrodriguez@carltonfields.com;smcloughlin@carltonfields.com;schau@carltonfields.com;NDunn@carltonfields.com;ecfla@carltonfields.com
- **Fred Neufeld** fneufeld@sycr.com, tingman@sycr.com
- **Nancy Newman** nnewman@hansonbridgett.com, ajackson@hansonbridgett.com;calendarclerk@hansonbridgett.com
- **Bryan L Ngo** bngo@fortislaw.com, BNgo@bluecapitallaw.com;SPicariello@fortislaw.com;JNguyen@fortislaw.com;JNguyen@bluecapitallaw.com
- **Abigail V O'Brient** avobrient@mintz.com, docketing@mintz.com;DEHashimoto@mintz.com;nleali@mintz.com;ABLevin@mintz.com;GJLeon@mintz.com

- **John R OKeefe** jokeefe@metzlewis.com, slohr@metzlewis.com
- **Scott H Olson** solson@vedderprice.com, scott-olson-2161@ecf.pacerpro.com,ecfsfdocket@vedderprice.com,nortega@vedderprice.com
- **Giovanni Orantes** go@gobklaw.com, gorantes@orantes-law.com,cmh@gobklaw.com,gobklaw@gmail.com,go@ecf.inforuptcy.com;orantesgr89122@notify.bestcase.com
- **Keith C Owens** kowens@venable.com, khoang@venable.com
- **R Gibson Pagter** gibson@ppilawyers.com, ecf@ppilawyers.com;pagterr51779@notify.bestcase.com
- **Paul J Pascuzzi** ppascuzzi@ffwplaw.com
- **Lisa M Peters** lisa.peters@kutakrock.com, marybeth.brukner@kutakrock.com
- **Christopher J Petersen** cjpetersen@blankrome.com, gsolis@blankrome.com
- **Mark D Plevin** mplevin@crowell.com, cromo@crowell.com
- **Steven G. Polard** spolard@ch-law.com, calendar-lao@rmkb.com;melissa.tamura@rmkb.com;anthony.arriola@rmkb.com
- **David M Powlen** david.powlen@btlaw.com, pgroff@btlaw.com
- **Christopher E Prince** cprince@lesnickprince.com, jmack@lesnickprince.com;cprince@ecf.courtdrive.com
- **Lori L Purkey** bareham@purkeyandassociates.com
- **William M Rathbone** wrathbone@grsm.com, jmydlandevans@grsm.com;sdurazo@grsm.com
- **Jason M Reed** Jason.Reed@Maslon.com
- **Michael B Reynolds** mreynolds@swlaw.com, kcollins@swlaw.com
- **J. Alexandra Rhim** arhim@hrhlaw.com
- **Emily P Rich** erich@unioncounsel.net, bankruptcycourtnotices@unioncounsel.net
- **Robert A Rich** , candonian@huntonak.com
- **Lesley A Riis** lriis@dpmclaw.com
- **Debra Riley** driley@allenmatkins.com
- **Jason E Rios** jrios@ffwplaw.com
- **Julie H Rome-Banks** julie@bindermalter.com
- **Mary H Rose** mrose@buchalter.com
- **Gregory A Rougeau** grougeau@brlawssf.com
- **Megan A Rowe** mrowe@dsrhealthlaw.com, lwestoby@dsrhealthlaw.com
- **Nathan A Schultz** nschultz@goodwinlaw.com
- **Mark A Serlin** ms@swllplaw.com, mor@swllplaw.com
- **Seth B Shapiro** seth.shapiro@usdoj.gov
- **David B Shemano** dshemano@shemanolaw.com
- **Joseph Shickich** jshickich@riddellwilliams.com
- **Mark Shinderman** mshinderman@milbank.com, dmuhrez@milbank.com;dlbatie@milbank.com
- **Kyrsten Skogstad** kskogstad@calnurses.org, rcraven@calnurses.org
- **Michael St James** ecf@stjames-law.com
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **Jason D Strabo** jstrabo@mwe.com, cfuraha@mwe.com
- **Sabrina L Streusand** Streusand@slollp.com
- **Ralph J Swanson** ralph.swanson@berliner.com, sabina.hall@berliner.com
- **Michael A Sweet** msweet@foxrothschild.com, swillis@foxrothschild.com;pbasa@foxrothschild.com
- **James M Toma** james.toma@doj.ca.gov, teresa.depaz@doj.ca.gov
- **Gary F Torrell** gtorrell@health-law.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Cecelia Valentine** cecelia.valentine@nlrb.gov
- **Jason Wallach** jwallach@ghplaw.com, g33404@notify.cincompass.com
- **Kenneth K Wang** kenneth.wang@doj.ca.gov, Jennifer.Kim@doj.ca.gov;Stacy.McKellar@doj.ca.gov;yesenia.caro@doj.ca.gov
- **Phillip K Wang** phillip.wang@rimonlaw.com, david.kline@rimonlaw.com
- **Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com
- **Adam G Wentland** awentland@tocounsel.com, lkwon@tocounsel.com
- **Latonia Williams** lwilliams@goodwin.com, bankruptcy@goodwin.com

- **Michael S Winsten** mike@winsten.com
- **Jeffrey C Wisler** jwisler@connollygallagher.com, dperkins@connollygallagher.com
- **Neal L Wolf** nwolf@hansonbridgett.com, calendarclerk@hansonbridgett.com, lchappell@hansonbridgett.com
- **Claire K Wu** ckwu@sulmeyerlaw.com,
mviramontes@sulmeyerlaw.com;ckwu@ecf.courtdrive.com;ckwu@ecf.inforuptcy.com
- **Steven D Wyllie** steven.wyllie@nlrb.gov
- **Hatty K Yip** hatty.yip@usdoj.gov
- **Andrew J Ziaja** aziaja@leonardcarder.com,
sgroff@leonardcarder.com;msimons@leonardcarder.com;lbadar@leonardcarder.com
- **Rose Zimmerman** rzimmerman@dalycity.org

SERVICE LIST
(Via First Class Mail)

Verity Health System of California, Inc.

2040 E. Mariposa Avenue
El Segundo, CA 90245

Samuel R. Maizel

Dentons US LLP
601 South Figueroa Street
Suite 2500
Los Angeles, CA 90017

SERVICE LIST
(Via Personal Delivery)

The Honorable Ernest M. Robles
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1560/Courtroom 1568
Los Angeles, CA 90012-3300

SERVICE LIST

(Via Email)

Attorneys for Chapter 11 Debtors and Debtors in Possession

Samuel R. Maizel – samuel.maizel@dentons.com

John A. Moe, II – john.moe@dentons.com

Tania M. Moyron – tania.moyron@dentons.com

Nick Koffroth – nick.koffroth@dentons.com

UMB Bank, N.A., c/o Mintz

Daniel Bleck – DSBleck@mintz.com

Paul Ricotta – PRicotta@mintz.com

Wells Fargo Bank, N.A., c/o Mintz

Daniel Bleck – DSBleck@mintz.com

Paul Ricotta – PRicotta@mintz.com

U.S. Bank, N.A., c/o Maslon LLP & McDermott Will & Emery

Clark Whitmore – clark.whitmore@maslon.com

Nathan F. Coco – ncoco@mwe.com

MOB Financing, LLC and MOB Financing II, LLC c/o Jones Day

Bruce Bennett – bbennett@jonesday.com

Benjamin Rosenblum – brosenblum@jonesday.com

Peter S. Saba – psaba@jonesday.com