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7 Debtors In Possession

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

9 In re:  
10 VERITY HEALTH SYSTEM OF CALIFORNIA,  
INC., *et al.*,  
11 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

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

Chapter 11 Cases  
Hon. Judge Ernest M. Robles

**SECOND STIPULATION CONTINUING  
OBJECTION DEADLINE OF NANTWORKS, LLC  
RELATED TO MOTION TO APPROVE  
DISCLOSURE STATEMENT DESCRIBING  
AMENDED JOINT CHAPTER 11 PLAN OF  
LIQUIDATION (DATED JUNE 16, 2020) AND  
RELATED RELIEF [RELATED DOCKET NOS.  
4879, 4880, 4881, 4889, 4893, 4943]**

**Hearing:**

Date: July 2, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: Courtroom 1568  
255 East Temple Street  
Los Angeles, California 90012

Debtors and Debtors In Possession.



1 **STIPULATION**

2 This Stipulation is entered into between Verity Health System Of California, Inc. (“VHS”) and  
3 the above-referenced affiliated debtors, the debtors and debtors in possession in the above-captioned  
4 chapter 11 bankruptcy cases (collectively, the “Debtors”), on the one hand, and NantWorks, LLC  
5 (“NantWorks”), on the other hand.

6 **RECITALS**

7 A. On June 16, 2020, the Debtors filed the *Amended Joint Chapter 11 Plan of Liquidation*  
8 (*Dated June 16, 2020*) [Docket No. 4879] (the “Plan”), related disclosure statement [Docket No. 4880]  
9 (the “Disclosure Statement”), and *Joint Motion for an Order Approving: (I) Proposed Disclosure*  
10 *Statement; (II) Solicitation and Voting Procedures; (III) Notice and Objection Procedures for*  
11 *Confirmation of Amended Joint Plan; (IV) Setting Administrative Claims Bar Date; and (V) Granting*  
12 *Related Relief* [Docket No. 4881] (the “Motion”).<sup>1</sup>

13 B. On June 17, 2020, the Court entered an order [Docket No. 4889] setting the hearing on  
14 the Motion for July 2, 2020, at 10:00 a.m., requiring that parties file any objections to the Motion not  
15 later than June 23, 2020 (the “Objection Deadline”), and requiring that parties file replies in support  
16 of the Motion not later than June 29, 2020, at 12:00 p.m. (Pacific Time) (the “Reply Deadline”).

17 C. On June 24, 2020, the Court entered an order [Docket No. 4943] approving the  
18 stipulation [Docket No. 4935] between the Debtors and NantWorks extending the Objection Deadline  
19 from June 23, 2020, to June 26, 2020, at 12:00 p.m. (Pacific Time), and extending the Reply Deadline  
20 from June 29, 2020, at 12:00 p.m. (Pacific Time), to June 30, 2020, at 12:00 p.m. (Pacific Time).

21 D. The Debtors and NantWorks have continued to engage in discussions concerning the  
22 Plan and Disclosure Statement. NantWorks has requested a further extension of the Objection  
23 Deadline, and the Debtors have agreed to further continue the Objection Deadline for any objection to  
24 the Motion filed by NantWorks (an “Objection”).

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<sup>1</sup> Except as otherwise defined herein, all capitalized terms have the definitions set forth in the Motion.

**AGREEMENT**

**NOW, THEREFORE**, the parties to this Stipulation hereby agree and stipulate as follows:

1. The deadline for NantWorks to file an Objection shall be continued from June 26, 2020, at 12:00 p.m. (Pacific Time), to June 29, 2020 at 12:00 p.m. (Pacific Time).

2. The Reply Deadline for any Objection shall be continued from June 30, 2020, at 12:00 p.m. (Pacific Time), to July 1, 2020, at 5:00 p.m. (Pacific Time).

**Verity Health System of California, Inc., et al.**

/s/ Tania M. Moyron  
Samuel R. Maizel  
Tania M. Moyron  
Dentons US LLP  
Counsel to Debtors and Debtors In Possession

**NantWorks, LLC**

          
Peter S. Saba  
Jones Day LLP  
Counsel to NantWorks, LLC

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**Verity Health System of California, Inc., et al.**

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Samuel R. Maizel  
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**NantWorks, LLC**



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