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Attorney for Creditor,
Seoul Medical Group Inc.

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

In re:

VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.*,

Debtors and Debtors In Possession.

- Affects All Debtors
- Affects Verity Health System of California, Inc.
- Affects O’Connor Hospital
- Affects Saint Louise Regional Hospital
- Affects St. Francis Medical Center
- Affects St. Vincent Medical Center
- Affects Seton Medical Center
- Affects O’Connor Hospital Foundation
- Affects Saint Louise Regional Hospital Foundation
- Affects St. Francis Medical Center of Lynwood Foundation
- Affects St. Vincent Foundation
- Affects St. Vincent Dialysis Center, Inc.
- Affects Seton Medical Center Foundation
- Affects Verity Business Services
- Affects Verity Medical Foundation
- Affects Verity Holdings, LLC
- Affects De Paul Ventures, LLC
- Affects 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. Judge Ernest M. Robles

CREDITOR SEOUL MEDICAL GROUP INC.’S NOTICE OF RESERVATION OF RIGHTS TO OBJECT TO THE DEBTORS’ CONFIRMATION OF THEIR SECOND AMENDED CHAPTER 11 PLAN

HEARING:

Date: August 12, 2020
Time: 10:00 a.m.
Place: Crtrm. 1568
255 E. Temple Street,
Los Angeles, CA 90012



1820151200729000000000063

1 **TO THE HONORABLE ERNEST M. ROBLES, UNITED STATES BANKRUPTCY**
 2 **JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND PARTIES**
 3 **REQUESTING SPECIAL NOTICE:**

4 **PLEASE TAKE NOTICE** that Seoul Medical Group, Inc. (“SMG”) hereby reserves its
 5 rights to object to the Debtors’ Second Amended Chapter 11 Plan set to be heard on August 12,
 6 2020 pending the ruling on the Debtors’ Motion to Approve Compromise Among St. Vincent
 7 Medical Center, Central Health Plan of California, Inc., Central Health MSO, Inc., and Seoul
 8 Medical Group, Inc. Filed by Creditor Seoul Medical Group Inc. (Docket no. 5124) to which SMG
 9 has filed a Notice of Joinder as Docket No. 5265.

10 This notice is filed only in an abundance of caution because, SMG and the debtor, among
 11 others, have already reached a settlement agreement and the Motion to Approve Compromise
 12 among St. Vincent Medical Center, Central Health Plan of California, Inc., Central Health MSO,
 13 Inc., and Seoul Medical Group, Inc. (the “Motion”) (Docket No. 5124) is also scheduled to be heard
 14 on August 12, 2020 at 10:00 A.M. If for any reason the Motion is not granted, SMG may present
 15 the Court with oral objections at the time of the confirmation hearing.

16
 17 DATED: July 29, 2020

THE ORANTES LAW FIRM, P.C.

19 By: /s/ Giovanni Orantes
 20 Giovanni Orantes
 21 Attorney for Creditor,
 22 Seoul Medical Group, Inc.

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 24
 25
 26
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 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:

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A true and correct copy of the foregoing document entitled (*specify*): CREDITOR SEOUL MEDICAL GROUP INC.'S NOTICE OF RESERVATION OF RIGHTS TO OBJECT TO THE DEBTORS' CONFIRMATION OF THEIR SECOND AMENDED CHAPTER 11 PLAN 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*) 7/29/2020, 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*) 7/29/2020, 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.

United States Bankruptcy Court
Honorable Judge Ernest M. Robles
255 E. Temple Street, Suite 1560
Los Angeles, CA 90012

Service information continued on attached page

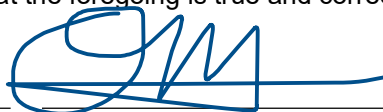
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those 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.

7/29/2020
Date

Omar Amaya
Printed Name


Signature

2:18-bk-20151-ER Notice will be electronically mailed to:

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