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Debtors In Possession

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

10 In re

Lead Case No. 2:18-bk-20151-ER

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

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

12 Debtors and Debtors In Possession.

- 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 ASC, LLC

Chapter 11 Cases  
Hon. Judge Ernest M. Robles

**STIPULATION CONTINUING REPLY DEADLINE  
RELATED TO CONFIRMATION OBJECTION  
FILED BY SCAN HEALTH PLAN**

**[RELATES TO DOCKET NOS. 4993, 4997, 5303, 5337]**

Hearing Date and Time:  
Date: August 12, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: Courtroom 1568  
255 E. Temple St.  
Los Angeles, CA 90012

Debtors and Debtors In Possession.

DENTONS US LLP  
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1 **STIPULATION**

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

6 **RECITALS**

7 A. On July 2, 2020, the Debtors filed the *Second Amended Joint Chapter 11 Plan of*  
8 *Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and the*  
9 *Committee* [Docket No. 4993] (the “Plan”) and related *Disclosure Statement Describing Second*  
10 *Amended Joint Chapter 11 Plan of Liquidation (Dated July 2, 2020) of the Debtors, the*  
11 *Prepetition Secured Creditors, and the Committee* [Docket No.4994].

12 B. On July 2, 2020, the Court entered the *Order Granting Joint Motion for an Order*  
13 *Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting Procedures; (III)*  
14 *Notice and Objection Procedures for Confirmation of Amended Joint Plan; (IV) Setting*  
15 *Administrative Claims Bar Date; and (V) Granting Related Relief* [Docket No. 4997] (the  
16 “Order”), setting the hearing on confirmation of the Plan (the “Confirmation Hearing”) on August  
17 12, 2020, at 10:00 a.m. (Pacific Time). *See* Order at 14. The Court also set July 30, 2020, as the  
18 deadline to file objections to confirmation of the Plan (the “Objection Deadline”) and August 5,  
19 2020, as the deadline to file replies (the “Reply Deadline”) in support of the Plan. *See id.* at 15-  
20 16.

21 C. On July 31, 2020, the Court entered an order [Docket No. 5303] approving a  
22 stipulation [Docket No. 5287] between the parties to continue the SCAN Objection Deadline to  
23 August 3, 2020, and continue the Reply Deadline for any objection filed by SCAN to August 7,  
24 2020.

25 D. On August 3, 2020, SCAN filed *Limited Objection of SCAN Health Plan to*  
26 *Second Amended Joint Chapter 11 Plan of Liquidation (Dated July 2, 2020) of the Debtors, the*  
27 *Prepetition Secured Creditors and the Committee* [Docket No. 5337] (the “Objection”).

28 E. The Parties continue to engage in negotiations concerning the Plan and the

1 Objection, and jointly agree to extend the Reply Deadline to allow additional time to engage in  
2 negotiations.

3 **AGREEMENT**

4 NOW, THEREFORE, all of the Parties to this Stipulation hereby stipulate and agree that  
5 the Reply Deadline shall be extended from August 7, 2020, to August 9, 2020, with respect to the  
6 Objection.

7  
8 Dated: August 7, 2020

DENTONS US LLP

9 By: /s/ Tania M. Moyron

Tania M. Moyron

10 Counsel to the Debtors and Debtors in Possession  
11

12 Dated: August 7, 2020

LOEB & LOEB LLP

13 By: /s/ Daniel B. Besikof

Karl E. Block

Daniel B. Besikof

Lisa E. Rubin

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16 Counsel to SCAN Health Plan  
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