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**UNITED STATES BANKRUPTCY COURT
FOR THE 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 ASC, LLC

Debtors and Debtors In Possession.

Lead Bankruptcy Case No. 2:18-bk-20151-BB
Jointly Administered with:
Case No. 2:18-bk-20162-BB
Case No. 2:18-bk-20163-BB
Case No. 2:18-bk-20164-BB
Case No. 2:18-bk-20165-BB
Case No. 2:18-bk-20167-BB
Case No. 2:18-bk-20168-BB
Case No. 2:18-bk-20169-BB
Case No. 2:18-bk-20171-BB
Case No. 2:18-bk-20172-BB
Case No. 2:18-bk-20173-BB
Case No. 2:18-bk-20175-BB
Case No. 2:18-bk-20176-BB
Case No. 2:18-bk-20178-BB
Case No. 2:18-bk-20179-BB
Case No. 2:18-bk-20180-BB
Case No. 2:18-bk-20181-BB

Chapter 11 Cases
Hon. Judge Sheri Bluebond

**STIPULATION CONTINUING HEARING
DATE AND EXTENDING REPLY
DEADLINE RE MOTION FOR
AUTHORITY TO USE RESTRICTED
FUNDS [DOCKET NOS. 6817]**

Hearing:

Date: March 5, 2025
Time: 10:00 a.m.
Place: Courtroom 1539
255 East Temple Street
Los Angeles, California 90012

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1 This Stipulation is entered between the Liquidation Trustee (the “Liquidation Trustee”) of
2 the VHS Liquidation Trust, established pursuant to the *Modified Second Amended Joint Chapter 11*
3 *Plan of Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and*
4 *the Committee* [Docket No. 5466], confirmed by the order [Docket No. 5504] entered August 14,
5 2020, and that certain Liquidation Trust Agreement, dated as of September 5, 2020 [Docket
6 No. 6043], on the one hand, and the California Attorney General, on the other, with respect to the
7 following:
8

9 1. On December 11, 2024, the Liquidation Trustee filed the *Motion for Authority to*
10 *Use Restricted Funds* [Docket No. 6817] (the “Motion to Use Restricted Funds”).

11 2. The Court set a hearing on the Motion to Use Restricted Funds for January 8, 2025,
12 at 1:00 p.m. (the “Hearing Date”). The deadline to respond to the Motion to Use Restricted Funds
13 was December 26, 2024 (the “Response Deadline”).
14

15 3. On December 20, 2024, the Court approved a stipulation [Docket No. 6828]
16 between the California Attorney General and the Liquidation Trustee, extending the Response
17 Deadline to January 15, 2025, and continuing the Hearing Date to January 29, 2025, at 2:00 p.m.
18

19 4. On January 13, 2025, the Court approved a stipulation [Docket No. 6835] between
20 the California Attorney General and the Liquidation Trustee, extending the Response Deadline to
21 January 22, 2025, and continuing the Hearing Date to February 5, 2025, at 10:00 a.m.

22 5. On January 21, 2025, the Court approved a stipulation [Docket No. 6840] between
23 the California Attorney General and the Liquidation Trustee, extending the Response Deadline to
24 January 29, 2025, and continuing the Hearing Date to February 12, 2025, at 1:00 p.m.

25 6. On January 29, 2025, the California Attorney General filed its opposition [Docket
26 No. 6844] (the “Opposition”) to the Motion to Use Restricted Funds. The deadline for the
27 Liquidation Trustee to file a reply in support of the Motion to Use Restricted Funds was February
28

5, 2025 (the "Reply Deadline").

7. On February 5, 2025, the Court approved a stipulation [Docket No. 6848] between the California Attorney General and the Liquidation Trustee, extending the Reply Deadline to February 26, 2025, and continuing the Hearing Date to March 5, 2025, at 10:00 a.m.

8. The Liquidation Trustee has requested a further continuance of the Hearing Date and extension of the Reply Deadline and the Liquidation Trustee has agreed.

NOW THEREFORE all of the parties to this Stipulation hereby stipulate and agree as follows:

A. The Hearing Date shall be continued from March 5, 2025, to March 26, 2025, at 10:00 a.m.

B. The Liquidation Trustee's Reply Deadline shall be extended to March 19, 2025.

Liquidation Trustee

By /s/ Tania M. Moyron

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*Counsel to the Post Effective Date Debtors
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California Attorney General

By 

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Counsel to the Office of the Attorney General

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is Suite 2500, 601 South Figueroa Street, Los Angeles, California 90017-5704.

A true and correct copy of the document entitled (*specify*): STIPULATION CONTINUING HEARING DATE AND EXTENDING REPLY DEADLINE RE MOTION FOR AUTHORITY TO USE RESTRICTED FUNDS [DOCKET NOS. 6817] 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 Local Rules, the foregoing document will be served by the court via NEF and hyperlink to the document. On February 20, 2025, I checked the CM/ECF docket for this case and determined that the following person/s is/are on the Electronic Mail Notice List to receive NEF transmission, including.

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3. SERVED BY PERSONAL DELIVERY, NEXT BUSINESS DAY, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling Local Rules, on February 20, 2025, 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 or next business day delivery to the judge will be completed no later than 12:00 noon after the document is filed.

Honorable Sheri Bluebond
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1652 / Courtroom 1645
Los Angeles, CA 90012

- ☒ Until further notice, on all matters except for evidentiary hearings, no judge's copies are required unless specifically requested by chambers
- ☐ By Messenger w/NEF behind
- ☐ By Next Business Day
- ☐ By Facsimile to _____
- ☐ By Email to mb_chambers@cacb.uscourts.gov

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

February 20, 2025
Date

Geoffrey M. Miller
Printed Name

/s/ Geoffrey M. Miller
Signature

PROOF OF SERVICE – Case No. 2:18-bk-20151-BB

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