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and Special Counsel to the Liquidation Trustee*

**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 26, 2025  
Time: 10:00 a.m.  
Place: Courtroom 1539  
255 East Temple Street  
Los Angeles, California 90012

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

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

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

23 6. On January 29, 2025, the California Attorney General filed its opposition [Docket  
24 No. 6844] (the “Opposition”) to the Motion to Use Restricted Funds. The deadline for the  
25 Liquidation Trustee to file a reply in support of the Motion to Use Restricted Funds was February  
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1 5, 2025 (the “Reply Deadline”).

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

5 8. On February 21, 2025, the Court approved a stipulation [Docket No. 6852] between  
6 the California Attorney General and the Liquidation Trustee, extending the Reply Deadline to  
7 March 19, 2025, and continuing the Hearing Date to March 26, 2025, at 10:00 a.m.

8 9. The California Attorney General and the Liquidation Trustee have agreed to a  
9 further continuance of the Hearing Date and extension of the Reply Deadline to allow further  
10 investigation and settlement discussions.

11 NOW THEREFORE all of the parties to this Stipulation hereby stipulate and agree as  
12 follows:  
13

14 A. The Hearing Date shall be continued from March 26, 2025, to June 25, 2025, at  
15 10:00 a.m.

16 B. The Liquidation Trustee’s Reply Deadline shall be extended to June 18, 2025.

17 [Signature page to follow]  
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**Liquidation Trustee**

By /s/ Tania M. Moyron

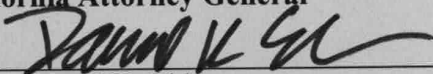
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## PROOF OF SERVICE OF DOCUMENT

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 March 17, 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 March 17, 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  
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- ☒ 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.

March 17, 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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