Docket #0007 Date Filed: 9/4/2018

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Proposed Attorneys for the Chapter 11 Debtors and Debtors In Possession

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re,

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

Debtor and Debtor 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 Medical 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.

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

Debtors and Debtors In Possession,

Plaintiffs,

v.

OLD REPUBLIC INSURANCE COMPANY and CITY NATIONAL BANK,

Defendants.

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

DECLARATION OF KATHRYN HOWARD REGARDING THE SERVICE OF EX PARTE EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER WITHOUT NOTICE AND PRELIMINARY INJUNCTION ENJOINING DEFENDANT FROM MAKING CERTAIN DRAWS ON A LETTER OF CREDIT

Adv. Proc. No. 2:18-ap-01277-ER

Hearing:
Date: September 12, 2018
Time: 10:00 a.m.
Place: Courtroom 1568

Hon Judge Ernest M. Robles

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1820151180906000000000018

I, Kathryn Howard, declare, that if called as a witness, I would or could competently testify thereto, of my own personal knowledge, as follows:

1. I am a paralegal with the Los Angeles Office of Dentons US LLP, and I work with on the Verity Health System of California, Inc., et al., Chapter 11 cases (Lead Case No. 2:18-bk-20151-ER), and the adversary proceeding of Verity Health System of California, Inc. v. Old Republic Insurance Company, et al. (Adv. Proc. No. 2:18-ap-01277-ER) filed August 31, 2018 in the United State Bankruptcy Court, Central District of California, Los Angeles Division.

2. I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to above-captioned cases. My business address is 601 South Figueroa Street, Suite 2500, Los Angeles, California 90017-5704.

3. Pursuant to the Court's *Order Granting Motion For Temporary Restraining Order Without Notice Enjoining Defendant From Making Certain Draws On A Letter Of Credit* [Docket No. 4] (the "Order"), on Debtors' and Debtors' In Possession and Plaintiffs' *Ex Parte Emergency Motion For Temporary Restraining Order Without Notice And Preliminary Injunction Enjoining Defendant From Making Certain Draws On A Letter Of Credit; Memorandum Of Points And Authorities And Declarations In Support Thereof* [Docket No. 3] (the "Motion"), I caused true and correct copies of the Complaint [Docket No. 2], the Motion and the Order to be served via email upon in-house counsel and counsel for Defendant Old Republic Insurance Company and in-house counsel for Defendant City National Bank prior to 5:00 p.m. on August 31, 2018. Further, a set of the aforementioned documents were also served on August 31, 2018 via Federal Express.

4. Attached hereto as Exhibit "A" is a true and correct copy of Kathryn Howard's email serving the afore-referenced documents upon in-house counsel and counsel to Old Republic Insurance Company and City National Bank.

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

Executed this 4th day of September, 2018.

DENTONS US LLP

BY: /S/*KATHRYN HOWARD*
PROPOSED ATTORNEYS FOR DEBTORS

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601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

EXHIBIT "A"

Howard, Kathryn

From: Howard, Kathryn
Sent: Friday, August 31, 2018 2:25 PM
To: 'jheitkamp@oldrepublic.com'; 'tdare@oldrepublic.com'; 'panderson@fslc.com'; 'jared.wolff@cnb.com'
Cc: Maizel, Samuel R.; Millner, Robert B.
Subject: Verity Health System of California v. Old Republic - Adv. Proc. No. 2:18-ap-01277-ER
Attachments: Complaint (Docket No. 2).pdf; Ex Parte Emergency Motion for TRO (Docket No. 3).pdf; Order Granting Motion for TRO (Docket No. 4).pdf

Good afternoon,

Pursuant to Sam Maizel's instructions, I have attached the following documents filed August 31, 2018 in the United States Bankruptcy Court, Central District of California, Los Angeles Division, in the above-referenced case:

1) Complaint;
2) Ex Parte Emergency Motion for TRO and Preliminary Injunction;
3) Judge Robles' Order Granting the TRO, and setting a hearing on September 12, 2018, at 10:00 a.m.

Please contact Sam Maizel should you have any questions.

Thank you,
Kathryn

DENTONS

Kathryn Howard
Paralegal

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Website

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Maclay Murray & Spens > Gallo Barrios Pickmann > Muñoz > Cardenas & Cardenas > Lopez Velarde > Rodyk > Boekel > OPF Partners > 大成 > McKenna Long

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