Docket #0009 Date Filed: 1/18/2019

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Attorneys for Local Initiative Health Authority for Los Angeles County dba L.A. Care Health Plan

**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.

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☐ 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.

Adv. Proc. No. 2:19-ap-01002-ER
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. Ernest M. Robles

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**STIPULATION FOR ENTRY OF ORDER EXTENDING DEADLINE TO ANSWER OR OTHERWISE PLEAD TO COMPLAINT FOR BREACH OF WRITTEN CONTRACTS, TURNOVER, UNJUST ENRICHMENT, DAMAGES FOR VIOLATION OF THE AUTOMATIC STAY, AND INJUNCTIVE RELIEF**

ST. VINCENT MEDICAL CENTER, a California nonprofit public benefit corporation and ST. FRANCIS MEDICAL CENTER, a California nonprofit public benefit corporation,

Plaintiffs,

v.

LOCAL INITIATIVE HEALTH AUTHORITY FOR LOS ANGELES COUNTY DBA L.A. CARE HEALTH PLAN, an independent local public agency,

Defendant.

Through their attorneys, Plaintiffs St. Vincent Medical Center and St. Francis Medical Center (together, "Plaintiffs") and Defendant Local Initiative Health Authority for Los Angeles County d/b/a/ L.A. Care Health Plan ("Defendant" and, together with Plaintiffs, the “Parties”), hereby stipulate and agree that the Court may enter an order continuing the deadline for Defendant to answer or otherwise plead to Plaintiffs' Complaint to February 15, 2019. In support of this Stipulation, the Parties state the following:

1. Plaintiffs filed the Complaint on January 3, 2019.

2. On January 3, 2019, Plaintiffs' counsel emailed Defendant's counsel inquiring whether the latter would agree to accept service of process via email.

3. On January 8, 2019, Defendant's counsel responded confirming that he was authorized to accept service and that service via email would be sufficient.

4. On January 8, 2019, Defendant's counsel also requested that the deadline to answer or otherwise plead to the Complaint be continued until the close of business on Friday, February 15, 2019 because Defendant’s counsel had a long-scheduled vacation during the previous week. Plaintiffs' counsel responded later that day agreeing to extend Defendant's deadline to answer or otherwise plead to the Complaint to February 15, 2019.

5. This is the first request for an enlargement of time to answer or otherwise

plead to the Complaint.

6. Extending Defendant's time to answer or otherwise plead to the Complaint until February 15, 2019 will not affect any other deadlines currently calendared in this matter.

**IT IS SO STIPULATED**.

DATED: January 18, 2019 HANSON BRIDGETT LLP

By: */s/ Neal L. Wolf*
NEAL L. WOLF
Attorneys for Local Initiative Health Authority for Los Angeles County dba L.A. Care Health Plan

DATED: January 18, 2019 PACHULSKI STANG ZIEHL & JONES LLP

By: */s/ Steven J. Kahn*
STEVEN J. KAHN
Attorneys for St. Vincent Medical Center and St. Francis Medical Center

**ATTESTATION CLAUSE**

I, Neal L. Wolf, am the ECF User whose ID and password are being used to file this STIPULATION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT FOR BREACH OF WRITTEN CONTRACTS, TURNOVER, UNJUST ENRICHMENT, DAMAGES FOR VIOLATION OF THE AUTOMATIC STAY, AND INJUNCTIVE RELIEF. In compliance with Local Rule 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: January 18, 2019 HANSON BRIDGETT LLP

By: */s/ Neal L. Wolf*

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Chapter 11 Cases

Hon. Ernest M. Robles

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**[PROPOSED] ORDER EXTENDING DEADLINE TO ANSWER OR OTHERWISE PLEAD TO COMPLAINT FOR BREACH OF WRITTEN CONTRACTS, TURNOVER, UNJUST ENRICHMENT, DAMAGES FOR VIOLATION OF THE AUTOMATIC STAY, AND INJUNCTIVE RELIEF**

ST. VINCENT MEDICAL CENTER, a California nonprofit public benefit corporation and ST. FRANCIS MEDICAL CENTER, a California nonprofit public benefit corporation,

Plaintiffs,

v.

LOCAL INITIATIVE HEALTH AUTHORITY FOR LOS ANGELES COUNTY DBA L.A. CARE HEALTH PLAN, an independent local public agency,

Defendant.

Presently before the Court is a Stipulation to Extend Deadline To Answer or Otherwise Plead To Complaint For Breach Of Written Contracts, Turnover, Unjust Enrichment, Damages For Violation Of The Automatic Stay, And Injunctive Relief ("Stipulation"). Good cause appearing, the Court GRANTS the Stipulation, as follows:

1. The deadline for Defendant Local Initiative Health Authority for Los Angeles County d/b/a/ L.A. Care Health Plan to answer or otherwise plead to the Complaint in Adversary Proceeding Number 2:19-ap-01002-ER shall be extended to and include February 15, 2019.

**IT IS SO ORDERED.**

Dated: _____

_____
HON. ERNEST M. ROBLES