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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.

☐ 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.

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

Adversary No. 2:19-ap-01002-ER

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS

[No Hearing Requested]

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

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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.

TO THE HONORABLE ERNEST M. ROBLES, UNITED STATES BANKRUPTCY JUDGE, DEFENDANT, AND ALL OTHER PARTIES ENTITLED TO NOTICE HEREOF:

Plaintiffs, St. Vincent Medical Center and St. Francis Medical Center ("Plaintiffs") hereby move this Court, pursuant to 11 U.S.C. § 107(c) and Rule 9037 of the Federal Rules of Bankruptcy Procedure for a protective order to restrict public access to certain filed documents containing personal data identifiers for an individual (including a patient's name, date of birth, and subscriber number). *See also* Local Bankruptcy Rule 1002-1(e). Plaintiffs further move that the Court authorize the redaction of such personal data identifiers from the pages identified on the attached list and direct the clerk of the court to restrict public access to these pages as originally filed, whether electronically or manually, so that the personal data identifiers are not available to public.

Plaintiffs hereby certify that the documents on the attached list containing personal data identifiers were inadvertently filed on the date stated below and that public disclosure of personal data identifiers would create undue risk of identity theft or other unlawful injury to the individual or his/her property.

PACHULSKI STANG ZIEHL & JONES LLP

Dated: March 20, 2019

/s/ Steven J. Kahn
Steven J. Kahn
Co-Counsel to Chapter 11 Debtors and Debtors In Possession

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

ATTACHMENT TO MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS

LIST OF DOCUMENTS IDENTIFIED IN MOTION TO BE REDACTED AND PUBLIC ACCESS TO BE RESTRICTED.

Docket or Claim No.	Date Filed	Name of Document
0025	03/19/2019	Plaintiffs' Opposition to Motion to Dismiss, Etc. at Exh. B, pp. 42, 43, and 45

PACHULSKI STANG ZIEHL & JONES LLP
ATTORNEYS AT LAW
LOS ANGELES, CALIFORNIA

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: **150 California Street, 15th Floor, San Francisco, CA 94111**

A true and correct copy of the foregoing document entitled (*specify):* ***PLAINTIFFS' MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS*** 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 LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **March 20, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Anthony Dutra adutra@hansonbridgett.com
- Steven J Kahn skahn@pszjlaw.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Neal L Wolf nwolf@hansonbridgett.com, calendarclerk@hansonbridgett.com,lchappell@hansonbridgett.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **March 20, 2019**, 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 delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA OVERNIGHT MAIL
Honorable Ernest M. Robles
U.S. Bankruptcy Court
255 E. Temple Street, Suite 1560 / Courtroom 1568
Los Angeles, CA 90012

☐ Service information continued on attached page

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

March 20, 2019	Matthew Renck	/s/ Matthew Renck
Date	*Printed Name*	*Signature*