Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

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☐ *Individual appearing without attorney*
☒ *Attorney for:* Plaintiffs

FOR COURT USE ONLY

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:

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

Debtor(s).

CASE NO.: 2:18-bk-20151-ER

ADVERSARY NO.: 2:19-ap-01042-ER

CHAPTER: 11

VERITY HEALTH SYSTEM OF CALIFORNIA, INC., a California nonprofit public benefit corporation, ST. VINCENT MEDICAL CENTER, a California nonprofit public benefit corporation and ST. FRANCIS MEDICAL CENTER, a California nonprofit public benefit corporation

Plaintiffs.

vs.

HERITAGE PROVIDER NETWORK, INC., a California corporation

Defendant.

JOINT STATUS REPORT [LBR 7016-1(a)(2)]

DATE: May 14, 2019
TIME: 10:00 a.m.
COURTROOM: 1568
ADDRESS: 255 E. Temple Street, Los Angeles, CA

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1 (a)(2):

A. PLEADINGS/SERVICE:

1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? ☒ Yes ☐ No
2. Have all parties filed and served answers to the Claims Documents? ☒ Yes ☐ No
3. Have all motions addressed to the Claims Documents been resolved? ☒ Yes ☐ No
4. Have counsel met and conferred in compliance with LBR 7026-1? ☒ Yes ☐ No

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below *(or on attached page):*

N/A

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff	Defendant
January 27, 2020	January 27, 2020

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff	Defendant
Per Court's Scheduling Order	Per Court's Scheduling Order

3. When do you expect to complete your discovery efforts?

Plaintiff	Defendant
Fact Discovery Close: September 30, 2019	Fact Discovery Close: September 30, 2019
Expert Disclosure: October 15, 2019	Expert Disclosure: October 15, 2019
Expert Rebuttal Disclosure: November 15, 2019	Expert Rebuttal Disclosure: November 15, 2019
Expert Discovery Close: December 15, 2019	Expert Discovery Close: December 15, 2019

4. What additional discovery do you require to prepare for trial?

Plaintiff	Defendant
Interrogatories, Requests for Admission, Document Production, Depositions	Interrogatories, Requests for Admission, Document Production, Depositions

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial *(including rebuttal stage if applicable)?*

Plaintiff	Defendant
2 days	2 days

2. How many witnesses do you intend to call at trial *(including opposing parties)?*

Plaintiff	Defendant
Unknown at present	Uunknown at present

3. How many exhibits do you anticipate using at trial?

Plaintiff	Defendant
Unknown at present	Unknown at present

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff	Defendant
Pretrial conference ☒ is ☐ is not requested	Pretrial conference ☒ is ☐ is not requested
Reasons:	Reasons:
Narrow issues	Narrow issues

Plaintiff	Defendant
Pretrial conference should be set after:	Pretrial conference should be set after:
(*date*) January 15, 2020	(*date*) January 15, 2020

E. SETTLEMENT:

1. What is the status of settlement efforts?
None to date

2. Has this dispute been formally mediated? ☐ Yes ☒ No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff	Defendant
☐ Yes ☒ No	☐ Yes ☒ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff	Defendant
I ☒ do ☐ do not consent to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.	I ☐ do ☒ do not consent to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: *(Use additional page if necessary)*

1. The parties request that the discovery/disclosure dates and Pre-Trial Conferences dates set forth above amend the Court's Scheduling Order entered March 13, 2019 [Dkt. No. 10].
2. The parties have agreed to exchange Rule 7026(a)(1) Initial Disclosures no later than May 14, 2019.
3. The parties will present to the Court a form of Protective Order as to the designation and treatment of information asserted by either party to be confidential and have agreed to otherwise comply with HIPPA requirements as to documents and other data containing patient confidential information.
4. The parties have agreed to preserve documents and ESI in their possession, custody or control that are relevant to the claims and defenses asserted in the action.

Respectfully submitted,

Date: April 29, 2019	Date: April 29, 2019
PACHULSKI STANG ZIEHL & JONES LLP Printed name of law firm	LESLIE COHEN LAW, PC Printed name of law firm
/s/ Steven J,. Kahn Signature	 Signature
STEVEN J. KAHN Printed name	LESLIE A. COHEN Printed name
Attorney for: Plaintiffs	Attorney for: Defendant

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:
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1 (a)(2)]** 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)* April 29, 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:

- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;odalys@lesliecohenlaw.com
- Steven J Kahn skahn@pszyjw.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

☐ 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*) April 29, 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 HAND DELIVERY
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.

April 29, 2019	MARY DE LEON	*/s/ Mary de Leon*
Date	*Printed Name*	*Signature*