Docket #0027 Date Filed: 6/12/2019

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

Debtors.

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

CHAPTER 11

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

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.

REQUEST FOR ASSIGNMENT TO MEDIATION PROGRAM

[NOTE: A COMPLETED ORDER ASSIGNING MATTER TO MEDIATION AND APPOINTING MEDIATOR AND ALTERNATE MEDIATOR MUST BE CONCURRENTLY UPLOADED THROUGH LODGED ORDER UPLOAD (LOU) WITH THIS REQUEST]

[NO HEARING REQUIRED]

I hereby request that the following matter be assigned to the Bankruptcy Mediation Program of this district:

Description of the Matter:

1. ☐ Objection to claim/claim resolution
2. ☐ Plan
   - ☐ Objection to plan confirmation
   - ☐ Plan formulation/negotiation
3. ☐ Valuation
4. ☐ Preference

5. ☐ Fraudulent transfer
6. ☐ Lien avoidance
7. ☐ Dischargeability

   Specify grounds: _____

   _____

8. ☒ Other. Please specify: Alleged breach of contract, wrongful setoff, turnover and violation of automatic stay

   _____

Amount of money at issue in Matter:

1. ☐ $0 to $1,000
2. ☐ $1,001 to $10,000
3. ☐ $10,001 to $50,000
4. ☐ $50,001 to $100,000
5. ☐ $100,001 to $500,000
6. ☐ $500,001 to $1,000,000
7. ☐ $1,000,001 to $5,000,000
8. ☒ $5,000,001 to $10,000,000
9. ☐ If more than $10,000,000,

   state amount: $ _____
10. ☐ Money not at issue.

SUBMITTED JOINTLY BY:

Date: June 5, 2019

Verity Health System of California, Inc., on behalf of itself and St. Vincent Medical Center and St. Francis Medical Center
(Name of party)

By: ANITA CHOU
(Signature of party)

Date: June 5, 2019

PACHULSKI STANG ZIEHL & JONES LLP
By: Steven J. Kahn
(Name of party's counsel)

/s/ Steven J. Kahn
(Signature of party's counsel)

Date: June ___, 2019

Heritage Provider Network, Inc.
(Name of party)

By: _____
(Signature of party)

Date: June ___, 2019

LESLIE COHEN LAW, PC
By: Leslie A. Cohen
(Name of party's counsel)

_____
(Signature of party's counsel)

Instructions from the court: A completed ORDER ASSIGNING MATTER TO MEDIATION PROGRAM AND APPOINTING MEDIATOR AND ALTERNATE MEDIATOR must be concurrently uploaded through Lodged Order Upload (LOU) with this Request for Assignment to Mediation Program.

cc: Hon. Barry Russell
Mediation Program Administrator
United States Bankruptcy Court
255 East Temple Street, Suite 1660
Los Angeles, CA 90012

SUBMITTED JOINTLY BY:

Date: June 5, 2019

Verity Health System of California, Inc., on behalf of itself and St. Vincent Medical Center and St. Francis Medical Center
(Name of party)

By: _____
(Signature of party)

Date: June 5, 2019

PACHULSKI STANG ZIEHL & JONES LLP
By: Steven J. Kahn
(Name of party's counsel)

/s/ Steven J. Kahn
(Signature of party's counsel)

Date: June 11, 2019

Heritage Provider Network, Inc.
(Name of party)

By: _____
(Signature of party)

Date: June 11, 2019

LESLIE COHEN LAW, PC
By: Leslie A. Cohen
(Name of party's counsel)

_____
(Signature of party's counsel)

Instructions from the court: A completed ORDER ASSIGNING MATTER TO MEDIATION PROGRAM AND APPOINTING MEDIATOR AND ALTERNATE MEDIATOR must be concurrently uploaded through Lodged Order Upload (LOU) with this Request for Assignment to Mediation Program.

cc: Hon. Barry Russell
Mediation Program Administrator
United States Bankruptcy Court
255 East Temple Street, Suite 1660
Los Angeles, CA 90012

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 described as **REQUEST FOR ASSIGNMENT TO MEDIATION PROGRAM** 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 indicated below:

I. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Order(s) and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 12, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) 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

II. SERVED BY UNITED STATES MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served): On June 12, 2019, I served the following person(s) and/or entity(ies) at the last known address(es) 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/or with an overnight mail service 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.

Mediator: Allan H. Ickowitz, Nossaman LLP, 777 S. Figueroa Street, 34th Floor, Los Angeles, CA 90017

Alternate Mediator: Douglas M. Neistat, Greenberg & Bass LLP, 16000 Ventura Blvd., Suite 1000, Encino, CA 91436

☐ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on June 12, 2019, I served the following person(s) and/or entity(ies) by personal delivery, 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 the judge will be completed no later than 24 hours after the document is filed.

VIA HAND DELIVERY	**VIA HAND DELIVERY**
Honorable Ernest M. Robles U.S. Bankruptcy Court 255 E. Temple Street, Suite 1560 / Courtroom 1568 Los Angeles, CA 90012	Attn: Daniel Koontz, Law Clerk to the 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.

Date: June 12, 2019 Signature: /s/ Mary de Leon

Printed Name: MARY DE LEON