Docket #0011 Date Filed: 7/18/2019

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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. OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VERITY HEALTH SYSTEM OF CALIFORNIA, INC., ET AL., Plaintiffs, v. UMB BANK, NATIONAL ASSOCIATION, Defendants.	Case No.: 2:18-bk-20151-ER Chapter 11 Adv. No.: 2:19-ap-01166-ER **STIPULATION TO EXTEND DEFENDANT'S TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** **[No Hearing Required]**

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Plaintiff, Official Committee of Unsecured Creditors of Verity Health System of California, Inc., et al. ("Plaintiff"), and Defendant, UMB Bank, National Association ("Defendant," and together with Plaintiff, the "Parties"), by and through their undersigned counsel, hereby enter into this Stipulation to Extend Defendant's Time to Answer or Otherwise Respond to the Complaint (the "Stipulation"), with reference to the following facts:

WHEREAS, on June 13, 2019, Plaintiff filed a complaint against Defendant for determination of the validity, priority and extent of liens and security interests (the "Complaint"), thereby commencing this adversary proceeding;

WHEREAS, the deadline for Defendant to respond to the Complaint is July 19, 2019; and

WHEREAS, the Parties are engaged in discussions regarding the possible resolution of the claims in this adversary proceeding and have reached an agreement in principle to engage in mediation. However, the Parties do not anticipate reaching a formal agreement regarding the proposed mediation process before the Response Deadline.

NOW, THEREFORE, the Parties hereby stipulate and agree to extend Defendant's deadline to respond to the Complaint through and including August 16, 2019, and request that the Court enter an order, in the form attached hereto as Exhibit A, granting this extension.

Dated: July 18, 2019

MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.

Paul J. Ricotta

Attorneys for Defendant
UMB Bank, N.A., as master indenture trustee

Dated: July 18, 2019

MILBANK LLP

Mark Shinderman
Robert J. Liubicic

Attorneys for Plaintiff
Official Committee of Unsecured Creditors of Verity Health System of California, Inc., et al.

EXHIBIT A

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The Court, having read and considered the *Stipulation to Extend Defendant's Time to Answer or Otherwise Respond to the Complaint* [Docket No. __] (the "Stipulation") between Plaintiff Official Committee of Unsecured Creditors of Verity Health System of California, Inc., et al., and Defendant UMB Bank, National Association, and for good cause appearing, it is ORDERED:

1. The Stipulation is APPROVED;

2. The deadline for Defendant to answer or otherwise respond to the Complaint is extended through and including **August 16, 2019**.

# # #

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: 2029 Century Park East, Suite 3100, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION TO EXTEND DEFENDANT'S TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** 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*) July 18, 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:

• Mark Shinderman - mshinderman@milbank.com, dmuhrez@milbank.com;dlbatie@milbank.com

• United States Trustee (LA) - ustpregionl6.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*) July 18, 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 FEDERAL EXPRESS
Honorable Ernest Robles
U.S. Bankruptcy Court
Roybal Federal Building
255 E. Temple Street, Suite 1560
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.

7/18/19	Diane Hashimoto		/s/ Diane Hashimoto
Date	*Printed Name*		*Signature*