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Attorneys for U.S. Bank National Association, not individually but as Series 2015 Notes Trustee and Series 2017 Notes Trustee, respectively

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re: VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.*, Debtors.	Lead Case No. 2:18-bk-20151-ER Chapter 11
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.*, Plaintiff, v. U.S. BANK NATIONAL ASSOCIATION, as trustee, Defendant.	Adv. Proc. No. 2:19-ap-01165-ER **STIPULATION BETWEEN U.S. BANK NATIONAL ASSOCIATION AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EXTENDING DEADLINE FOR RESPONSE TO COMPLAINT**

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This stipulation is entered as of July 18, 2019 between U.S. Bank National Association, as note trustee and collateral agent under each of the 2015/2017 Indentures and related collateral documents defined in the Complaint[1] (collectively, the "Trustee" or the "Defendant"), on the one hand, and the Official Committee of Unsecured Creditors ("Plaintiff" or the "Committee")[2] of debtors and debtors-in-possession (collectively, the "Debtors") in the above-captioned chapter 11 cases, on the other, with respect to the following:

1. On September 14, 2018, the Committee was formed.

2. On June 13, 2019 the Committee filed its Complaint initiating the above captioned adversary proceeding.

3. On June 19, 2019 a summons was issued by the Court and served upon the Defendant directing that a written response to the Complaint be filed and served no later than July 19, 2019 (the "Response Deadline").

4. The Parties have continued to work on resolving the dispute underlying the Complaint 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.

5. For the sake of judicial efficiency and in order to avoid unnecessary costs the Parties have agreed to extend the Response Deadline while they attempt to reach a formal arrangement regarding a mediation process.

NOW, THEREFORE, all of the parties to this stipulation hereby stipulate as follows:

A. The Response Deadline shall be extended from July 19, 2019 by twenty eight (28) days to August 16, 2019.

[1] *Complaint for Determination of Validity, Priority, and Extent of Liens and Security Interest* (Dkt. No. 1, 19-AP-1165-ER)

[2] The Defendant and Plaintiff shall be collectively referred to as the "Parties".

B. The Parties by agreeing to extend the Response Deadline do not intend to waive or modify their rights to file responsive pleadings, dispositive or non-dispositive motions, and all Parties hereby expressly reserve such rights.

U.S. Bank National Association
As Trustee for the 2015/2017 Working Capital Notes

By: _____
Clark T. Whitmore
Jason M. Reed
MASLON LLP
Co-Counsel to U.S. Bank National Association

AND

By: _____
Nathan F. Coco
Megan Preusker
MCDERMOTT WILL & EMERY LLP
Co-Counsel to U.S. Bank National Association

Official Committee of Unsecured Creditors

By: _____
Gregory A. Bray
Mark Shinderman
Robert J. Liubicic
James C. Behrens
MILBANK LLP
Counsel to the Official Committee of Unsecured Creditors

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this adversary proceeding. My business address is: McDermott Will & Emery LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067-3206.

A true and correct copy of the foregoing document, entitled STIPULATION BETWEEN U.S. BANK NATIONAL ASSOCIATION AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EXTENDING DEADLINE FOR RESPONSE TO 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 July 18, 2019, I checked the CM/ECF docket for this bankruptcy case 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, Robert J. Liubicic, Alexandra Achamallah, Thomas E. Jeffry Jr., and Robert M. Hirsh on behalf of the Official Committee of Unsecured Creditors of Verity Health System of California, Inc., et al. mshinderman@milbank.com, rliubicics@milbank.com, aachamallah@milbank.com, thomas.jeffry@arentfox.com, robert.hirsch@arentfox.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On July 18, 2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case 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 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
United States Bankruptcy Court for the Central District of California
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.

July 18, 2019	Jason D. Strabo	*/s/ Jason D. Strabo*
Date	*Printed Name*	*Signature*