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Case No. 2:19−cv−10352−DSF[1]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

In re: VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.*,[2] Debtors and Debtors in Possession.	On Appeal from the United States Bankruptcy Court for the Central District of California (Bankr. Lead Case No.: 2:18-bk-20151-ER) **NOTICE OF HEARING FOR STRATEGIC GLOBAL MANAGEMENT, INC.'S "MOTION TO CONSOLIDATE APPEALS"**
STRATEGIC GLOBAL	

[1] SGM seeks to consolidate this appeal (2:19-cv-10352-DSF) with the following related appeals: 2:19-cv-10354-DSF and 2:19-cv-10356-DSF.

[2] The other Debtors in the chapter 11 cases, being jointly administered under Lead Case No. 2:18-bk-20151-ER, are O'Connor Hospital 2:18-bk-20168-ER, Saint Louise Regional Hospital 2:18-bk-20162-ER, St. Francis Medical Center 2:18-cv-20165-ER, St. Vincent Medical Center 2:18-bk-20164-ER, Seton Medical Center 2:18-cv-20167-ER, O'Connor Hospital Foundation 2:18-bk-20179-ER, Saint Louise Regional Hospital Foundation 2:18-cv-20172-ER, St. Francis Medical Center of Lynwood Foundation 2:18-cv-20178-ER, St. Vincent Foundation 2:18-cv- 20180-ER, St. Vincent Dialysis Center, Inc. 2:18-cv-20171- ER Seton Medical Center Foundation 12:8-cv-20175-ER, Verity Business Services 2:18-cv-20173-ER, Verity Medical Foundation 2:18-cv-20169-ER, Verity Holdings, LLC 2:18-cv-20163-ER, DePaul Ventures, LLC 2:18-cv-20176-ER, and DePaul Ventures – San Jose Dialysis, LLC 2:18-cv-20181-ER.

MANAGEMENT, INC.,

Appellant,

v.

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

Appellees.

Date: January 27, 2020
Time: 1:30 p.m.
Judge: Hon. Dale S. Fischer
Place: Courtroom 7D, 350 W. First Street, Los Angeles, CA 90012

PLEASE TAKE NOTICE that Appellant Strategic Global Management, Inc. ("SGM") filed its "*Motion To Consolidate Appeals*" [Doc. No. 20] (the "Motion") on December 20, 2019. A copy of the Motion is on file with the Court, and may be obtained by contacting Jeffrey S. Kwong at Levene, Neale, Bender, Yoo & Brill L.L.P., 10250 Constellation Blvd., Suite 1700, Los Angeles, CA 90067, at JSK@LNBYB.COM, or at (310)229-1234.

PLEASE TAKE FURTHER NOTICE that the Court has set the Motion for hearing on January 27, 2019 at 1:30 p.m. in Courtroom 7D at 350 W. First Street, Los Angeles, CA 90012.

PLEASE TAKE FURTHER NOTICE that, through the Motion, SGM sought to consolidate its appeals from the Bankruptcy Court's orders of November 14, November 18, and November 27, 2019 (the "Orders") in the bankruptcy matter captioned *In re Verity Health System of California*, Bankr. C.D. Cal. Case No. 2:18-bk-20151-ER. All three appeals involve the same parties, the same operative facts, the same record, and the same issues, namely disputes between SGM and Verity Health Systems of California, Inc., and the above-referenced affiliated debtors and debtors-in-possession ("Debtors") regarding their Asset Purchase Agreement ("APA") and issues pertaining to alleged breaches and failures to comply with conditions set forth in the APA. Consolidation for the purposes of briefing, oral argument, and decision will serve the interests of the Court and parties in economy and efficiency.

PLEASE TAKE FURTHER NOTICE that SGM brings the Motion pursuant to Rule 8013(a) of the Federal Rules of Bankruptcy Procedure, Rule 7-4 of Chapter I of the Local Rules of the United States District Court for the Central District of California, and Federal Rule of Bankruptcy Procedure 8003(b)(2).

PLEASE TAKE FURTHER NOTICE that the Motion is based on this Notice of Hearing Date, the notice of Motion and Motion, the Declaration of Gary E. Klausner in support of the Motion, the arguments of counsel, and any other

admissible evidence brought before the Court at or before a hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that SGM will serve this Notice of Hearing in the manner set forth in the proof of service attached hereto. Pursuant to Federal Rule of Bankruptcy Procedure 8013(a)(3): (1) a response to the Motion must be filed within 7 days after service of the Motion; and (2) a reply to a response to the Motion must be filed within 7 days after service of the response.

Dated: January 3, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.
By: */s/ Jeffrey S. Kwong*

Gary E. Klausner
Jeffrey S. Kwong
Counsel for Strategic Global Management

CERTIFICATE OF SERVICE

1. I hereby certify that on January 3, 2020, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system.

2. I further certify that parties of record to this appeal who either are registered CM/ECF users, or who have registered for electronic notice, or who have consented in writing to electronic service, will be served through the CM/ECF system.

3. I further certify that some of the parties of record to this appeal may not have not consented to electronic service. I will serve the foregoing documents by the means set forth below:

Courtesy Copies via Personal Delivery on January 6, 2020
Chambers of the Hon. Dale S. Fischer
First Street Courthouse
350 West 1st Street
Courtroom 7D
Los Angeles, California 90012

Served Via Email on January 3, 2020
David K. Eldan, Deputy Attorney General
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Dated: January 3, 2020 */s/ Jeffrey S. Kwong*
JEFFREY S. KWONG