Docket #0014 Date Filed: 1/16/2020

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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.

- ☒ Affects All Debtors
- ☐ Affects Verity Health System of California, Inc.
- ☐ Affects O'Connor Hospital
- ☐ Affects Saint Louise Regional Hospital
- ☐ Affects St. Francis Medical Center
- ☐ Affects St. Vincent Medical Center
- ☐ Affects Seton Medical Center
- ☐ Affects O'Connor Hospital Foundation
- ☐ Affects Saint Louise Regional Hospital Foundation
- ☐ Affects St. Francis Medical Center of Lynwood Foundation
- ☐ Affects St. Vincent Foundation
- ☐ Affects St. Vincent Dialysis Center, Inc.
- ☐ Affects Seton Medical Center Foundation
- ☐ Affects Verity Business Services
- ☐ Affects Verity Medical Foundation
- ☐ Affects Verity Holdings, LLC
- ☐ Affects De Paul Ventures, LLC
- ☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors In Possession.

Lead Case No. 2:18-bk-20151-ER

Jointly administered with:
Case No. 2:18-bk-20162-ER;
Case No. 2:18-bk-20163-ER;
Case No. 2:18-bk-20164-ER;
Case No. 2:18-bk-20165-ER;
Case No. 2:18-bk-20167-ER;
Case No. 2:18-bk-20168-ER;
Case No. 2:18-bk-20169-ER;
Case No. 2:18-bk-20171-ER;
Case No. 2:18-bk-20172-ER;
Case No. 2:18-bk-20173-ER;
Case No. 2:18-bk-20175-ER;
Case No. 2:18-bk-20176-ER;
Case No. 2:18-bk-20178-ER;
Case No. 2:18-bk-20179-ER;
Case No. 2:18-bk-20180-ER;
Case No. 2:18-bk-20181-ER;

Chapter 11 Cases

Hon. Ernest M. Robles

Adversary No. 2:20-AP-01001-ER

PROOF OF SERVICE OF MEMORANDUM OF DECISION (1) DENYING WITHOUT PREJUDICE *EX-PARTE* MOTION TO FILE MATERIALS UNDER SEAL AND (2) REQUIRING DEFENDANTS TO SUBMIT

1820151200117000000000002

VERITY HEALTH SYSTEM OF CALIFORNIA, INC., a California nonprofit public benefit corporation, ST. VINCENT MEDICAL CENTER, a California nonprofit public benefit corporation, ST. VINCENT DIALYSIS CENTER, INC., a California nonprofit public benefit corporation, and ST. FRANCIS MEDICAL CENTER, a California nonprofit public benefit corporation, SETON MEDICAL CENTER, a California nonprofit public benefit corporation, and VERITY HOLDINGS, LLC, a California limited liability company; and

Plaintiffs,

v.

KALI P. CHAUDHURI, M.D., an individual, STRATEGIC GLOBAL MANAGEMENT, INC., a California corporation, KPC HEALTHCARE HOLDINGS, INC. a California Corporation KPC HEALTH PLAN HOLDINGS, INC. a California Corporation, KPC HEALTHCARE, INC. a Nevada Corporation, KPC GLOBAL MANAGEMENT, LLC, a California Limited Liability Company, and DOES 1 through 500,

Defendants.

EVIDENCE SUPPORTING THE CONFIDENTIALITY OF THE MATERIALS BY NO LATER THAN JANUARY 30, 2020 AND ORDER (1) DENYING WITHOUT PREJUDICE *EX-PARTE* MOTION TO FILE MATERIALS UNDER SEAL AND (2) REQUIRING DEFENDANTS TO SUBMIT EVIDENCE SUPPORTING THE CONFIDENTIALITY OF THE MATERIALS BY NO LATER THAN JANUARY 30, 2020

DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
(213) 623-9300

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: 601 S. Figueroa Street, Suite 2500, Los Angeles, CA 90017-5704

A true and correct copy of the foregoing document entitled (*specify*): MEMORANDUM OF DEDCISION (1) DENYING WITHOUT PREJUDICE EX-PARTE MOTION TO FILE MATERIALS UNDER SEAL AND (2) REQUIRING DEFENDANTS TO SUBMIT EVIDENCE SUPPORTING THE CONFIDENTIALITY OF THE MATERIALS BY NO LATER THAN JANUARY 30, 2020; AND ORDER (1) DENYING WITHOUT PREJUDICE EX PARTE MOTION TO FILE MATERIALS UNDER SEAL AND (2) REQUIRING DEFENDANTS TO SUBMIT EVIDENCE SUPPORTING THE CONFIDENTIALITY OF THE MATERIALS BY NO LATER THAN JANUARY 30, 2020

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*) January 16, 2020 , 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:

- Samuel R Maizel samuel.maizel@dentons.com, alicia.aguilar@dentons.com;docket.general.lit.LOS@dentons.com;tania.moyron@dentons.com; kathryn.howard@dentons.com;joan.mack@dentons.com;derry.kalve@dentons.com

- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com;nick.koffroth@dentons.com;Sonia.martin@dentons.com;Isabella.hsu@dentons.com; lee.whidden@dentons.com;Jacqueline.whipple@dentons.com

- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On (*date*) January 16, 2020 , 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*) January 16, 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.

USBC Central District of California
Hon. Ernest M. Robles
Edward R. Roybal Federal Building and US Courthouse
255 East 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.

January 16, 2020	JoAn Mack	/s/ JoAn Mack
Date	*Printed Name*	*Signature*

2. **SERVED BY UNITED STATES MAIL - CERTIFIED**

Gary E. Klausner
Strategic Global Management, Inc.
c/o Levene, Neale, Bender, Yoo & Brill
10250 Constellation Blvd.
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Los Angeles, CA 90067

Chief Executive Officer
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Corona, CA 92879

William E. Thomas
KPC Health Plan Holdings, Inc.
9 KPC Parkway, Suite 301
Corona, CA 92879

Chief Executive Officer
KPC Health Plan Holdings, Inc.
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Corporation Service Company
KPC Healthcare, Inc.
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Carson City, NV 89703

KPC Healthcare Holdings, Inc.
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Santa Ana, CA 92705

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Sacramento, CA 95833

Managing Member
KPC Global Management, LLC
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Hemet, CA 92543

Kali P. Chaudhuri, MD
9 KPC Pkwy, Suite 301
Corona, CA 92879

Kali P. Chaudhuri, MD
42830 Chaudhuri Circle
Hemet, CA 92544

FILED & ENTERED

JAN 16 2020

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY gonzalez DEPUTY CLERK

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.

☒Affects All Debtors

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☐ Affects De Paul Ventures, LLC
☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors in Possession.

Lead Case No.: 2:18-bk-20151-ER
Chapter: 11

Jointly Administered With:
Case No. 2:18-bk-20162-ER;
Case No. 2:18-bk-20163-ER;
Case No. 2:18-bk-20164-ER;
Case No. 2:18-bk-20165-ER;
Case No. 2:18-bk-20167-ER;
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Case No. 2:18-bk-20179-ER;
Case No. 2:18-bk-20180-ER;
Case No. 2:18-bk-20181-ER;

Chapter 11 Cases.

MEMORANDUM OF DECISION (1) DENYING WITHOUT PREJUDICE *EX-PARTE* MOTION TO FILE MATERIALS UNDER SEAL AND (2) REQUIRING DEFENDANTS TO SUBMIT EVIDENCE SUPPORTING THE CONFIDENTIALITY OF THE MATERIALS BY NO LATER THAN JANUARY 30, 2020

[RELATES TO DOC. NO. 2]

Verity Health System of California, Inc., et al.,

Plaintiffs,

v.

Strategic Global Management, Inc., et al.,

Defendants

[No hearing required pursuant to Federal Rule of Civil Procedure 78(b) and Local Bankruptcy Rule 9013-1(j)(3)]

The Court has reviewed *Plaintiffs' Ex-Parte Motion for an Order Allowing Plaintiffs to File Correspondence Related to Complaint Under Seal* (the "Motion") [Doc. No. 2]. Pursuant to Civil Rule 78(b) and LBR 9013-1(j),[1] this matter is suitable for disposition without oral argument. For the reasons set forth below, the Motion is **DENIED WITHOUT PREJUDICE**.

I. Background

Plaintiffs seek authorization to file the following materials under seal:

1) An August 13, 2018 letter from Strategic Global Management, Inc. ("SGM") to the Plaintiffs (the "Letter"), containing information regarding SGM's access to liquidity available in connection with SGM's offer to purchase certain of the hospitals operated by the Plaintiffs (the "Hospitals").
2) A non-binding draft term sheet sent by Defendants to Plaintiffs, dated October 3, 2019 (the "Term Sheet"), containing evidence regarding SGM's ability to finance its purchase of the Hospitals.

Plaintiffs also seek authorization to file under seal paragraphs 42 and 82 of their *Complaint for Breach of Contract, Promissory Fraud, and Tortious Breach of Contract (Breach of Implied Covenant of Good Faith and Fair Dealing)* (the "Complaint") [Doc. No. 1]. Paragraphs 42 and 82 contain allegations revealing information set forth in the Letter and Term Sheet.

Plaintiffs state that they are seeking to file the materials under seal in order to avoid litigation regarding the issue, given that SGM designated the materials as "highly confidential" when they were produced. Plaintiffs reserve the right to seek an order unsealing the Complaint for any purpose, including taking the position that the Letter and/or Term Sheet are not confidential.

II. Findings and Conclusions

Section 107(b) provides in relevant part: "On request of a party in interest, the bankruptcy court shall … protect an entity with respect to a trade secret or confidential research, development, or commercial information." Commercial information is "information which would cause 'an unfair advantage to competitors by providing them information as to the commercial operations of the debtor.'" *In re Orion Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994) (internal citations omitted). The Court "must 'carefully and skeptically review sealing requests to insure that there really is an extraordinary circumstance or compelling need' to seal the documents at issue. The reason is simple—court records are public records, and sealing abridges the public's right to know." *In re Faucett*, 438 B.R. 564, 568 (Bankr. W.D. Tex. 2010). In addition, "[t]he right of public access to judicial records … is 'fundamental to a democratic state' and is analogous to the First Amendment right to freedom of speech and of the press and to the Sixth Amendment guarantee of public trials." *In re Inslaw, Inc.*, 51 B.R. 298, 299 (Bankr. D.D.C. 1985).

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[1] Unless otherwise indicated, all "Civil Rule" references are to the Federal Rules of Civil Procedure, Rules 1–86; all "Bankruptcy Rule" references are to the Federal Rules of Bankruptcy Procedure, Rules 1001–9037; all "Evidence Rule" references are to the Federal Rules of Evidence, Rules 101–1103; all "LBR" references are to the Local Bankruptcy Rules of the United States Bankruptcy Court for the Central District of California, Rules 1001-1–9075-1; and all statutory references are to the Bankruptcy Code, 11 U.S.C. §§ 101–1532.

The Motion is not supported by sufficient evidence showing that the Letter, Term Sheet, and the allegations related thereto (collectively, the "Materials") constitute a trade secret or confidential research, development, or commercial information within the meaning of § 107(b). In support of their request to seal the Materials, Plaintiffs point only to the fact that SGM designated the Materials as "highly confidential" at the time they were produced. In view of the strong policy favoring disclosure, a party's unsubstantiated assertion that information is confidential is not sufficient.

It appears that the impetus for the Motion is Defendants' designation of the Materials as "highly confidential." Therefore, the Court will require Defendants to submit evidence showing that the Materials fall within the scope of § 107(b). Defendants shall submit such evidence by no later than **January 30, 2020**. Upon review of Defendants' submission, the Court will determine whether further briefing or a hearing is required, and will notify the parties accordingly.

The Court will enter an order consistent with this Memorandum of Decision.

###

Date: January 16, 2020

Ernest M. Robles
United States Bankruptcy Judge

FILED & ENTERED

JAN 16 2020

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY gonzalez DEPUTY CLERK

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.

☒Affects All Debtors

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☐ Affects De Paul Ventures, LLC
☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Debtors and Debtors in Possession.

Lead Case No.: 2:18-bk-20151-ER
Adv. Case No.: 2:20-ap-01001-ER

Jointly Administered With:
Case No. 2:18-bk-20162-ER;
Case No. 2:18-bk-20163-ER;
Case No. 2:18-bk-20164-ER;
Case No. 2:18-bk-20165-ER;
Case No. 2:18-bk-20167-ER;
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Case No. 2:18-bk-20180-ER;
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Chapter 11 Cases.

ORDER (1) DENYING WITHOUT PREJUDICE *EX-PARTE* MOTION TO FILE MATERIALS UNDER SEAL AND (2) REQUIRING DEFENDANTS TO SUBMIT EVIDENCE SUPPORTING THE CONFIDENTIALITY OF THE MATERIALS BY NO LATER THAN JANUARY 30, 2020

[RELATES TO DOC. NO. 2]

Verity Health System of California, Inc., et al.,

Plaintiffs,

v.

Strategic Global Management, Inc., et al.,

Defendants

[No hearing required pursuant to Federal Rule of Civil Procedure 78(b) and Local Bankruptcy Rule 9013-1(j)(3)]

For the reasons set forth in the concurrently-issued *Memorandum of Decision (1) Denying Without Prejudice Ex-Parte Motion to File Materials Under Seal and (2) Requiring Defendants to Submit Evidence Supporting the Confidentiality of the Materials By No Later than January 30, 2020* (the "Memorandum of Decision"), the Court **HEREBY ORDERS AS FOLLOWS:**

1) The *Plaintiffs' Ex-Parte Motion for an Order Allowing Plaintiffs to File Correspondence Related to Complaint Under Seal* [Doc. No. 2] is **DENIED WITHOUT PREJUDICE**.
2) By no later than **January 30, 2020**, Defendants shall submit evidence showing that the Materials[1] fall within the scope of § 107(b).
3) Upon review of Defendants' submission, the Court will determine whether further briefing or a hearing is required, and will notify the parties accordingly.

IT IS SO ORDERED.

###

Date: January 16, 2020

Ernest M. Robles
United States Bankruptcy Judge

[1] Capitalized terms not defined herein have the meaning set forth in the Memorandum of Decision.

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KPC Health Plan Holdings, Inc.
9 KPC Parkway, Suite 301
Corona, CA 92879
US

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ATTN: Corporation Service Company
DBA CSC Lawyers Incorporating Servi
2170 Gateway Oaks Drive
Suite 150 N
Sacramento, CA 95833

Reference Information
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Chief Executive Officer
KPC Healthcare, Inc.
1301 North Tustin Avenue
Santa Ana, CA 92705
US

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Corona, CA 92879
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Corporation Service Company
KPC Healthcare, Inc.
112 North Curry Street
Carson City, NV 89703
US

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KPC Healthcare Holdings, Inc.
Attn: Corporation Service Co. dba
CSC Lawyers Incorporating Service
2710 Gateway Oaks Drive
Suite 150N
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US

Reference Information

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Total Postage and Fees	$	

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Kali P. Chaudhuri, MD
9 KPC Pkwy., Suite 301
Corona, CA 92879
US

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Certified Mail Restricted Delivery	$	
Postage	$	
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Sent to:
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10250 Constellation Blvd.
Suite 1700
Los Angeles, CA 90067

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