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Case No. 2:19−cv−10352−DSF[1]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

[1] This appeal (2:19-cv-10352-DSF) has been consolidated with the following related appeals: 2:19-cv-10354-DSF and 2:19-cv-10356-DSF.

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)
STRATEGIC GLOBAL MANAGEMENT, INC., Appellant, v. STATE OF CALIFORNIA; VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.* Appellees.	**STIPULATION TO EXTEND TIME FOR APPELLANT STRATEGIC GLOBAL MANAGEMENT, INC. TO FILE OPENING BRIEF**

Appellant Strategic Global Management, Inc. ("SGM"), Appellees Verity Health System, Inc., *et al.* ("Verity"), the Official Committee of Unsecured Creditors in Verity's bankruptcy cases (the "Committee"), and the California Attorney General (the "AG," and collectively, the "Parties") hereby enter into this stipulation (the "Stipulation") based on the following recitals of fact:

/ / /

[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.

RECITALS

1. The Bankruptcy Court for the Central District of California entered three orders dated: (1) November 14, 2019 [Bankr. Doc. No. 3611] (the "November 14 Order"); (2) November 18, 2019 [Bankr. Doc. No. 3633] (the "November 18 Order"); and (3) November 27, 2019 [Bankr. Doc. No. 3724] (the "November 27 Order, and together with the November 14 and 18 Orders, the "Orders").

2. SGM appealed the November 14 Order (2:19-cv-10352-DSF), November 18 Order (2:19-cv-10354-DSF), and November 27 Order (2:19-cv-10356-DSF) by timely filing its notices of appeal (collectively, the "Appeals"). The Appeals are now pending before the United States District Court for the Central District of California.

3. Pursuant to Federal Rule of Bankruptcy Procedure 8018(a)(1), the deadline for SGM to file its opening brief in the Appeals (the "Opening Brief") is February 7, 2020.

4. Counsel for SGM has communicated to Verity's counsel that SGM requires additional time to file the Opening Brief. SGM has not obtained any previous extensions to file the Opening Brief.

5. SGM, Verity, the Committee, and the AG have agreed to extend the deadline for SGM to file the Opening Brief for seven (7) days, to February 14, 2020.

STIPULATION

NOW THEREFORE, subject to the approval of the Court, the Parties hereby agree and stipulate as follows:

A. The deadline for SGM to file the Opening Brief in the Appeals shall be extended from February 7, 2020 to February 14, 2020, and the deadlines to file any responsive and reply briefs in the Appeals shall be extended accordingly.

B. The Stipulation shall be without prejudice to any party seeking further extensions of time from the Court to file briefs in the Appeal, or to file objections to any further extension requests to file briefs in the Appeal.

IT IS SO STIPULATED

Dated: January 27, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

By: */s/ Gary E. Klausner*
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

Dated: January ___, 2020

DENTONS US LLP

By: _____
Samuel R. Maizel
Sonia R. Martin
Tania M. Moyron

Counsel for Verity Health System, Inc., *et al*.

Dated: January ___, 2020

CALIFORNIA DEPARTMENT OF JUSTICE

By: _____
David K. Eldan

Counsel to Xavier Becerra, Attorney General of the State of California

Dated: January ___, 2020

MILBANK LLP

By: _____
Mark Shinderman
James C. Behrens

Counsel for the Official Committee of Unsecured Creditors

B. The Stipulation shall be without prejudice to any party seeking further extensions of time from the Court to file briefs in the Appeal, or to file objections to any further extension requests to file briefs in the Appeal.

IT IS SO STIPULATED

Dated: January ___, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

By: */s/ Gary E. Klausner*
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

Dated: January 24, 2020

DENTONS US LLP

By: _____

Samuel R. Maizel
Sonia R. Martin
Tania M. Moyron

Counsel for Verity Health System, Inc., *et al.*

Dated: January ___, 2020

CALIFORNIA DEPARTMENT OF JUSTICE

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David K. Eldan

Counsel to Xavier Becerra, Attorney General of the State of California

Dated: January ___, 2020

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IT IS SO STIPULATED

Dated: January ___, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

By: */s/ Gary E. Klausner*
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

Dated: January ___, 2020

DENTONS US LLP

By: _____
Samuel R. Maizel
Sonia R. Martin
Tania M. Moyron

Counsel for Verity Health System, Inc., *et al.*

Dated: January 23, 2020

CALIFORNIA DEPARTMENT OF JUSTICE

By: _____
David K. Eldan

Counsel to Xavier Becerra, Attorney General of the State of California

Dated: January ___, 2020

MILBANK LLP

By: _____
Mark Shinderman
James C. Behrens

Counsel for the Official Committee of Unsecured Creditors

B. The Stipulation shall be without prejudice to any party seeking further extensions of time from the Court to file briefs in the Appeal, or to file objections to any further extension requests to file briefs in the Appeal.

IT IS SO STIPULATED

Dated: January ___, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

By: */s/ Gary E. Klausner*
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

Dated: January ___, 2020

DENTONS US LLP

By: _____
Samuel R. Maizel
Sonia R. Martin
Tania M. Moyron

Counsel for Verity Health System, Inc., *et al.*

Dated: January ___, 2020

CALIFORNIA DEPARTMENT OF JUSTICE

By: _____
David K. Eldan

Counsel to Xavier Becerra, Attorney General of the State of California

Dated: January 24, 2020

MILBANK LLP

By: _____
Mark Shinderman
James C. Behrens

Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

1. I hereby certify that on January 27, 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 have not consented to electronic service. I have served the foregoing documents by the means set forth below:

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Dated: January 27, 2020

/s/ Gary E. Klausner
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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.*, 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)
STRATEGIC GLOBAL MANAGEMENT, INC., Appellant, v. STATE OF CALIFORNIA; VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.* Appellees.	**NOTICE OF LODGING OF [PROPOSED] ORDER APPROVING STIPULATION TO EXTEND TIME FOR APPELLANT STRATEGIC GLOBAL MANAGEMENT, INC. TO FILE OPENING BRIEF**

[1] This appeal (2:19-cv-10352-DSF) has been consolidated with the following related appeals: 2:19-cv-10354-DSF and 2:19-cv-10356-DSF.

PLEASE TAKE NOTICE that Appellant Strategic Global Management, Inc. ("SGM") hereby lodges the attached [Proposed] Order Approving Stipulation To Extend Time For Appellant Strategic Global Management, Inc. To File Opening Brief.

Dated: January 27, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.

By: */s/ Gary E. Klausner*
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

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Case No. 2:19−cv−10352−DSF[1]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

[1] This appeal (2:19-cv-10352-DSF) has been consolidated with the following related appeals: 2:19-cv-10354-DSF and 2:19-cv-10356-DSF.

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)
STRATEGIC GLOBAL MANAGEMENT, INC., Appellant, v. STATE OF CALIFORNIA; VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.* Appellees.	**[PROPOSED] ORDER APPROVING STIPULATION TO EXTEND TIME FOR APPELLANT STRATEGIC GLOBAL MANAGEMENT, INC. TO FILE OPENING BRIEF**

The Court having considered the "*Stipulation To Extend Time For Appellant Strategic Global Management, Inc. To File Opening Brief*" (the "Stipulation") entered into by and between Appellant Strategic Global Management, Inc. ("SGM"), Appellees Verity Health System, Inc., *et al.* ("Verity"), the Official Committee of Unsecured Creditors in Verity's bankruptcy cases (the "Committee"), and the California Attorney General (the "AG," and

[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.

collectively, the "Parties"), and good cause appearing,

HEREBY ORDERS AS FOLLOWS:

A. The deadline for SGM to file the Opening Brief[3] in the Appeals shall be extended from February 7, 2020 to February 14, 2020, and the deadlines to file any responsive and reply briefs in the Appeals shall be extended accordingly.

B. The Stipulation shall be without prejudice to any party seeking further extensions of time from the Court to file briefs in the Appeal, or to file objections to any further extension requests to file briefs in the Appeal.

Dated:

Hon. Dale S. Fischer
United States District Court Judge

[3] All Capitalized but undefined terms herein shall have the same meanings ascribed to them in the Stipulation.

CERTIFICATE OF SERVICE

1. I hereby certify that on January 27, 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.

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Dated: January 27, 2020

/s/ Gary E. Klausner
GARY E. KLAUSNER