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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

1820151200302000000000024

In re VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al*., Debtors and Debtors in Possession.	Case No.: 2:20-cv-00613-DOC (Related to District Court Appeals: Case Nos.: 2:19-cv-10352-DSF; 2:19-cv-10354-DSF; and 2:19-cv-10356-DSF)
☒ 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 ASC, LLC Debtors and Debtors in Possession.	Lead Chapter 11 Bankr. 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
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.	**Adv. Case No.:** 2:20-ap-01001-ER **STIPULATION TO SET BRIEFING SCHEDULE FOR, AND CONTINUE HEARING ON THE "MOTION FOR WITHDRAWAL OF REFERENCE OF ADVERSARY PROCEEDING FROM THE BANKRUPTCY COURT"**

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;

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.

Defendant Strategic Global Management, Inc. ("SGM"), on the one hand, and plaintiffs Verity Health System of California, Inc., St. Vincent Medical Center, St. Vincent Dialysis Center, Inc., St. Francis Medical Center, Seton Medical Center, and Verity Holdings, LLC (collectively, "Verity"), on the other hand, hereby enter into this stipulation (the "Stipulation") based on the following recitals of fact:

RECITALS

1. There are currently pending in the United States District Court three appeals from orders entered by the Bankruptcy Court for the Central District of California : (1) Case No. 2:19-cv-10352-DSF, appeal from the Bankruptcy Court's November 14, 2019 Order [Bankr. Doc. No. 3611]; (2) Case No. 2:19-cv-10354-DSF, appeal from the Bankruptcy Court's November 18, 2019 Order [Bankr. Doc. No. 3633]; and (3) Case No. 2:19-cv-10356-DSF, appeal from the Bankruptcy

Court's November 27 Order [Bankr. Doc. No. 3724] (herein the "Appeals").

2. The Appeals are now pending before the Honorable Dale S. Fischer in the U.S. District Court for the Central District of California.

3. On January 3, 2020, Verity filed a complaint against, among other parties, SGM, in the Bankruptcy Court alleging, among other things, SGM's breach of the Asset Purchase Agreement, thereby commencing the adversary proceeding titled *Verity Health System of California, Inc. et al., v. Strategic Global Management, Inc. et al.*, Adv. No. 2:20-ap-01001-ER (the "Adversary Proceeding").

4. On January 21, 2020, SGM filed its *Motion For Withdrawal Of Reference Of Adversary Proceeding From The Bankruptcy Court* (the "Motion") in which SGM requests that the District Court withdraw the reference of the Adversary Proceeding. The Motion has been assigned to, and pending before, the Honorable David O. Carter in the U.S. District Court for the Central District of California. Pursuant to the Court's notice of hearing dated January 27, 2020 [Doc. No. 9], the Motion is scheduled to be heard on February 10, 2020, at 8:30 a.m.

5. The parties to this Stipulation agree that it would be in the best interest of all parties to continue the hearing date of the Motion to February 24, 2020, at 8:30 a.m., or as soon thereafter as the Court may schedule the hearing, so that, among other reasons, the parties can have a reasonable opportunity to file any responsive and reply briefs.

WHEREFORE, subject to Court approval, the parties hereby stipulate and agree as follows:

A. The hearing date for the Motion shall be continued from February 10, 2020, at 8:30 a.m. to February 24, 2020 at 8:30 a.m., or as soon thereafter as the Court may schedule the hearing;

B. The deadlines for the filing of responsive and reply briefs shall be February 4, 2020 and February 11, 2020, respectively.

Dated: January 31, 2020

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

By: */s/ Gary E. Klausner*
Gary E. Klausner
Counsel for Defendant,
Strategic Global Management

Dated: January 31, 2020

DENTONS US LLP

By: 
Samuel R. Maizel
Sonia R. Martin
Tania M. Moyron
Counsel for Plaintiffs, Verity Health System, Inc., *et al*.

CERTIFICATE OF SERVICE
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Verity Health Systems of California, Inc., et al. v. Strategic Global Management, Inc., et al.

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and not a party to the within action; my business address is 10250 Constellation Blvd., Suite 1700, Los Angeles 90067.

On January 31, 2020, I served the foregoing document on the interested parties in this action as follows:

BY NEF:

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X (BY MAIL)

I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service. The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of such business.

Chambers of the Hon. David O. Carter
Ronald Reagan Federal Building
United States Courthouse
411 West Fourth Street, Courtroom 9D
Santa Ana, CA, 92701-4516

☐ **(BY OVERNIGHT DELIVERY)**
I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

☒ **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct, and that I am employed at the office of a member of the bar of this Court at whose direction the service was made.

Executed on January 31, 2020, at Los Angeles, California.

/s/ Lourdes Cruz

Lourdes Cruz

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UNITED STATES DISTRICT 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 ASC, LLC Debtors and Debtors in Possession.	Case No.: 2:20-cv-00613-DOC (Related to District Court Appeals: Case Nos.: 2:19-cv-10352-DSF; 2:19-cv-10354-DSF; and 2:19-cv-10356-DSF) Lead Chapter 11 Bankr. 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
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	**Adv. Case No.:** 2:20-ap-01001-ER **ORDER APPROVING *STIPULATION TO SET BRIEFING SCHEDULE FOR, AND CONTINUE HEARING ON THE "MOTION FOR WITHDRAWAL OF REFERENCE OF ADVERSARY PROCEEDING FROM THE BANKRUPTCY COURT"***

California nonprofit public benefit corporation, SETON MEDICAL CENTER, a California nonprofit public benefit corporation, and VERITY HOLDINGS, LLC, a California limited liability company;

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.

The Court having considered the "*Stipulation To Set Briefing Schedule For, And Continue Hearing On The 'Motion For Withdrawal Of Reference Of Adversary Proceeding From The Bankruptcy Court'*" (the "Stipulation") entered into by and between ("SGM"), on the one hand, and plaintiffs Verity Health System of California, Inc., St. Vincent Medical Center, St. Vincent Dialysis Center, Inc., St. Francis Medical Center, Seton Medical Center, and Verity Holdings, LLC (collectively, "Verity"), on the other hand, and good cause appearing,

HEREBY ORDERS AS FOLLOWS:

A. The hearing date for the Motion shall be continued from February 10, 2020 at 8:30 a.m. to February 24, 2020 at 8:30 a.m.; and

B. The deadlines for the filing of responsive and reply briefs shall be February 4, 2020 and February 11, 2020 respectively.

Dated:

Hon. David O. Carter
United States District Court Judge