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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 THE FILING OF RESPONSIVE AND REPLY BRIEFS**

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:

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[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. SGM filed and served its opening brief in the Appeals on February 14, 2020.

4. Pursuant to Federal Rule of Bankruptcy Procedure 8018(a), the current deadlines for: (1) the Appellees to file their joint responsive brief (the "Responsive Brief") is March 16, 2020; and (2) SGM to file its reply brief (the "Reply Brief") is March 30, 2020.

5. The AG has communicated to SGM's counsel that it requires additional time to file the joint Responsive Brief.

6. The Parties have agreed to: (1) extend the deadline for the Appellees to file their joint Responsive Brief to March 23, 2020; and (2) extend the deadline for SGM to file its Reply Brief to April 13, 2020.

STIPULATION

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

A. The deadline for the Appellees to file their joint Responsive Brief in the Appeals shall be extended from March 16, 2020 to March 23, 2020, and the

deadline for SGM to file its Reply Brief shall be extended from March 30, 2020 to April 13, 2020.

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: March 11, 2020

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

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

Counsel for Strategic Global Management, Inc.

Dated: February ___, 2020

DENTONS US LLP

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

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

Dated: February ___, 2020

CALIFORNIA DEPARTMENT OF JUSTICE

By: _____
David K. Eldan

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

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deadline for SGM to file its Reply Brief shall be extended from March 30, 2020 to April 13, 2020.

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: February ___, 2020

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

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

Counsel for Strategic Global Management, Inc.

Dated: March 11, 2020

DENTONS US LLP

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

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

Dated: February ___, 2020

CALIFORNIA DEPARTMENT OF JUSTICE

By: _____
David K. Ehlan

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

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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: February ___, 2020

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

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

Counsel for Strategic Global Management, Inc.

Dated: February ___, 2020

DENTONS US LLP

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

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

Dated: ~~February~~ March 10 2020

CALIFORNIA DEPARTMENT OF JUSTICE

By: _____
David K. Eldan

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

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Dated: ~~February~~ 3/10 ___, 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 March 11, 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:

Courtesy Copy Via U.S. Mail
Chambers of the Hon. Dale S. Fischer
First Street Courthouse
350 West 1st Street
Courtroom 7D
Los Angeles, California 90012

Dated: March 11, 2020

/s/ Gary E. Klausner
GARY E. KLAUSNER

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Telephone: (310) 284-3871
Attorneys for Strategic Global Management, Inc., Appellant

Case No. 2:19−cv−10352−DSF[1]

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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 THE FILING OF RESPONSIVE AND REPLY BRIEFS**

The Court having considered the "*Stipulation To Extend Time For The Filing Of Responsive And Reply Briefs*"[3] 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

[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.

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

bankruptcy cases (the "Committee"), and the California Attorney General (the "AG," and collectively, the "Parties"), and good cause appearing,

HEREBY ORDERS AS FOLLOWS:

A. The deadline for the Appellees to file their joint Responsive Brief in the Appeals shall be extended from March 16, 2020 to March 23, 2020, and the deadline for SGM to file its Reply Brief shall be extended from March 30, 2020 to April 13, 2020.

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