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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION - LOS ANGELES

In re VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al*. Debtors and Debtors in Possession.	Case No. 2:19-cv-10352-DSF[1] On Appeal from the United States Bankruptcy Court for the Central District of California (Bankr. Lead Case No.: 2:18-bk-20151-ER) Hon. Dale S. Fischer **STIPULATION TO EXTEND TIME FOR THE FILING OF RESPONSIVE AND REPLY BRIEFS**
STRATEGIC GLOBAL MANAGEMENT, INC., Appellant, v. STATE OF CALIFORNIA; VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al.* Appellees.	

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[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.

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STIPULATION

Appellees 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 (collectively, "Verity"), Appellant Strategic Global Management, Inc. ("SGM"), 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:

RECITALS

A. 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").

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

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

D. On March 11, 2020, the Parties filed a *Stipulation To Extend Time For The Filing Of Responsive And Reply Briefs* [Doc. No. 47] in this matter.

E. On March 12, 2020 this Court entered its *Order Approving Stipulation To Extend Time For The Filing Of Responsive And Reply Briefs* [Doc. No. 48].

F. Pursuant to the *Order Approving Stipulation To Extend Time For The Filing Of Responsive And Reply Briefs* [Doc. No. 48], the current deadlines for: (1) the Appellees to file their joint responsive brief (the "Responsive Brief") is March 23, 2020; and (2) SGM to file its reply brief (the "Reply Brief") is April 13, 2020.

G. The unprecedented impact of COVID-19 and the "Shelter in Place" Orders for the Bay Area of California have affected the briefing schedule. The AG has also communicated to SGM's counsel that it requires additional time to file the joint Responsive Brief.

H. The Parties have agreed to: (1) extend the deadline for the Appellees to file their joint Responsive Brief to March 30, 2020; and (2) extend the deadline for SGM to file its Reply Brief to April 27, 2020.

AGREEMENT

NOW, THEREFORE, the parties to this Stipulation hereby agree and stipulate as follows:

1. The deadline for Appellees to file their joint Responsive Brief in the Appeals shall be extended from March 23, 2020 to March 30, 2020, and the deadline for SGM to file its Reply Brief shall be extended from April 13, 2020 to April 27, 2020.

2. 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.

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Dated: March 18, 2020

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By _____
Tania M. Moyron

Counsel for Verity Health Systems of California, Inc., *et al.*

Dated: March __, 2020

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JEFFREY S. KWONG

By _____
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

Dated: March __, 2020

CALIFORNIA DEPARTMENT OF JUSTICE
DAVID K. ELDAN

By _____
David K. Eldan

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

Dated: March 18, 2020

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Dated: March __, 2020

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Dated: March 18, 2020

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Counsel for Strategic Global Management, Inc.

Dated: March __, 2020

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

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Dated: March __, 2020

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Dated: March __, 2020

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By_____
Gary E. Klausner

Counsel for Strategic Global Management, Inc.

Dated: March 16, 2020

CALIFORNIA DEPARTMENT OF JUSTICE
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By_____
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Counsel for Xavier Becerra, Attorney General of the State of California

Dated: March __, 2020

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CERTIFICATE OF SERVICE

1. I hereby certify that on March 18, 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 Personal Delivery
Chambers of the Hon. Dale S. Fischer
First Street Courthouse
350 West 1stStreet Courtroom 7D
Los Angeles, California 90012

Dated: March 18, 2020

Respectfully submitted,

DENTONS US LLP
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TANIA M. MOYRON

By: */s/Tania M. Moyron*
Counsel to Plaintiffs and Chapter 11 Debtors and Debtors In Possession

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION - LOS ANGELES

In re VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al*. Debtors and Debtors in Possession.	Case No. 2:20-cv-10352-DSF On Appeal from the United States Bankruptcy Court for the Central District of California (Bankr. Lead Case No.: 2:18-bk-20151-ER) Hon. Dale S. Fischer
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**

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The Court having considered the "*Stipulation To Extend Time For The Filing Of Responsive And Reply Briefs*"[1] entered into by and between Appellees Verity Health System, Inc., *et al*. ("Verity"), Appellant Strategic Global Management, Inc. ("SGM"), the Official Committee of Unsecured Creditors in Verity's 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 23, 2020 to March 30, 2020, and the deadline for SGM to file its Reply Brief shall be extended from April 13, 2020 to April 27, 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 ORDERED.

Dated: March __, 2020

Hon. Dale S. Fischer
UNITED STATES DISTRICT JUDGE

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