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Attorneys for Strategic Global Management, Inc.; Kali P. Chaudhuri, M.D.; KPC Healthcare Holdings, Inc.; KPC Health Plan Holdings, Inc.; KPC Healthcare, Inc.; and KPC Global Management, LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN 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

Case No. 2:20-CV-00613-DSF

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 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

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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.	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 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.	Adv. Case No. 2:20-ap-01001-ER **STIPULATION TO EXTEND DEFENDANTS' DEADLINE TO RESPOND TO PLAINTIFFS' FIRST AMENDED COMPLAINT** Judge: Hon. Dale S. Fischer

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, "Plaintiffs") and Defendants Strategic Global Management, Inc., Kali P. Chaudhuri, M.D., KPC Healthcare Holdings, Inc., KPC Health Plan Holdings, Inc., KPC Healthcare, Inc., and KPC Global Management, LLC, (collectively, the "Defendants"), by and through their respective counsel of record, hereby enter into this stipulation based on the following recitals of fact:

RECITALS

A. On January 3, 2020, Plaintiffs initiated this adversary proceeding in the Bankruptcy Court by filing their Complaint against Defendants.

B. On February 19, 2020, Defendants filed their Motion to Dismiss Plaintiffs' Complaint and their Special Motion to Strike Plaintiffs' Complaint Pursuant to California Code of Civil Procedure Section 425.16 (the "Motions").

C. On March 4, 2020, Plaintiffs filed their oppositions to the Motions.

D. On March 5, 2020, the Court granted Defendants' Motion to Withdraw the Reference of Adversary Proceeding and took jurisdiction over this adversary proceeding.

E. On March 11, 2020, Defendants filed their replies in support of the Motions.

F. On March 11, 2020, Defendants filed their First Amended Complaint in this action.

G. Pursuant to Federal Rule of Civil Procedure 15(a)(3), Defendants' deadline to respond to Plaintiffs' First Amended Complaint is currently March 25, 2020.

AGREEMENT

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

1. The deadline for Defendants to answer or otherwise respond to Plaintiffs' First Amended Complaint is hereby extended from March 25, 2020 to April 1, 2020.

IT IS SO STIPULATED.

Dated: March 19, 2020

DENTONS US LLP
SAMUEL R. MAIZEL
SONIA R. MARTIN
TANIA M. MOYRON
NICHOLAS A. KOFFROTH

By: /s/ Sonia R. Martin
Sonia R. Martin

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

Dated: March 19, 2020

BARNES & THORNBURG LLP

By: */s/ Kevin D. Rising*
Kevin D. Rising

Counsel for Defendants, Strategic Global Management, Inc., et. al.

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Garrett S. Llewellyn, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Garrett S. Llewellyn

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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.	CASE NO.: 2:18-bk-20179-ER CASE NO.: 2:18-bk-20180-ER CASE NO.: 2:18-bk-20181-ER
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The Court, having considered the Parties' Stipulation to Extend Defendants' Time to Respond to Plaintiffs' First Amended Complaint, and, good cause having been shown, **GRANTS** the Stipulation and

HEREBY ORDERS AS FOLLOWS:

1. The deadline for Defendants to answer or otherwise respond to Plaintiffs' First Amended Complaint shall be extended from March 25, 2020 to April 1, 2020.

IT IS SO ORDERED.

Dated: March __, 2020

Hon. Dale S. Fischer
UNITED STATES DISTRICT JUDGE