SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
SONIA MARTIN (State Bar No. 191148)
sonia.martin@dentons.com
TANIA M. MOYRON (Bar No. 235736)
tania.moyron@dentons.com
NICHOLAS A. KOFFROTH (Bar No. 287854)
nick.koffroth@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Tel: (213) 623-9300 / Fax: (213) 623-9924

Counsel to Appellees and Chapter 11 Debtors and Debtors In Possession

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

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
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**

Case 2:19-cv-10352-DSF Document 51 Filed 03/27/20 Page 1 of 8 Page ID #:2812

[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.

18201512003300000000000007

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

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.

Case 2:19-cv-10352-DSF Document 21 Filed 03/12/20 Page 2 of 6 Page ID #:2816

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. On March 18, 2020, the Parties filed a second *Stipulation to Extend Time for the Filing of Responsive and Reply Briefs* [Doc. No. 49] in this matter.

G. That same day, this Court entered its *Order Approving Stipulation to Extend Time for the Filing of Responsive and Reply Briefs* [Doc. No. 50].

H. Pursuant to the *Order Approving Stipulation To Extend Time For The Filing Of Responsive And Reply Briefs* [Doc. No. 50], the current deadline for: (1) the Appellees to file their joint responsive brief (the "Responsive Brief") is March 30, 2020; and (2) SGM to file its reply brief (the "Reply Brief") is April 27, 2020.

I. Verity operates general acute care hospitals and is highly focused on addressing the COVID-19 pandemic, as are other hospitals throughout the Country. For example, last week, Verity obtained approval from the Bankruptcy Court to enter into a lease with the State of California for its use of St. Vincent Medical Center to care for patients impacted by the COVID-19 pandemic, and an operating services agreement with the State which designated a number of beds at Seton Medical Center for COVID-19 patients. *See Order Granting Debtors' Emergency Motion to Approve Agreements With the State of California in Response to the COVID-19 Healthcare Emergency to (I) Provide Certain Healthcare Services at Seton Medical Center and (II) Lease St. Vincent Medical Center* [Bankr. Doc. No. 4328].

J. The Committee and AG have communicated to SGM's counsel that the appellees require additional time to file the joint Responsive Brief.

Case 8:19-cv-10325-DSF Document 51 Filed 03/27/20 Page 3 of 6 Page ID #:2811

K. The Parties have agreed to: (1) extend the deadline for the Appellees to file their joint Responsive Brief to April 6, 2020; and (2) extend the deadline for SGM to file its Reply Brief to May 4, 2020.

AGREEMENT

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

DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
(213) 623-9300

as follows:

1. The deadline for Appellees to file their joint Responsive Brief in the Appeals shall be extended from March 30, 2020 to April 6, 2020, and the deadline for SGM to file its Reply Brief shall be extended from April 27, 2020 to May 4, 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.

Dated: March 27, 2020

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

By */s/ Tania Moyron*
Tania M. Moyron

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

Dated: March 27, 2020

LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.
GARY E. KLAUSNER
JEFFREY S. KWONG

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

Counsel for Strategic Global Management, Inc.

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

Case 2:19-cv-10325-DSF Document 21 Filed 03/27/20 Page 4 of 5 Page ID #:

Dated: March 27, 2020

CALIFORNIA DEPARTMENT OF JUSTICE
DAVID K. ELDAN

By */s/David K. Eldan*
David K. Eldan

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

Dated: March 27, 2020

MILBANK LLP
MARK SHINDERMAN
JAMES C. BEHRENS

By */s/Mark Shinderman*
Mark Shinderman

Counsel for the Official Committee of Unsecured Creditors

DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
(213) 623-9300

Case 5:19-cv-10325-DSF Document 21 Filed 03/27/20 Page 5 of 6 Page ID #:2819

CERTIFICATE OF SERVICE

1. I hereby certify that on March 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.

Dated: March 27, 2020

Respectfully submitted,

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

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

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

Case 2:19-cv-10325-DSF Document 21 Filed 03/27/20 Page 6 of 6 Page ID #:2880

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 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**

Case 2:19-cv-10352-DSF Document 21-1 Filed 03/27/20 Page 1 of 2 Page ID #:2881

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 30, 2020 to April 6, 2020, and the deadline for SGM to file its Reply Brief shall be extended from April 27, 2020 to May 4, 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

Case 2:19-cv-10325-DSF Document 21-1 Filed 03/17/20 Page 2 of 2 Page ID #:2885

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