SAMUEL R. MAIZEL (Bar No. 189301)
samuel.maizel@dentons.com
SONIA MARTIN (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 Verity Health Defendants, DePaul Ventures, LLC 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

In re

VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al*.

Debtors and Debtors in Possession.

California Nurses Association CNA,

Plaintiff,

v.

Verity Health System of California, Inc., *et al.*

Defendant(s).

Case No.: 2:20-cv-02623-SVW

Bankr. Lead Case No.: 2:18-bk-20151-ER

Adversary Proceeding Case No.: 2:20-ap-1051-ER

Hon. Stephen V. Wilson

STIPULATION CONTINUING HEARING DATE OF MOTION TO WITHDRAW REFERENCE AND RELATED BRIEFING SCHEDULE

Continued Hearing Date and Time:
Date: May 11, 2020
Time: 1:30 p.m.
Place: Courtroom 10A
350 W. 1st Street, 10th Floor
Los Angeles, California 90012

Case 2:20-cv-02623-SVW Document 10 Filed 03/26/20 Page 1 of 2 Page ID #:87

18201512004150000000000025

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

STIPULATION

Defendants 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"), DePaul Ventures, LLC, Richard Adcock, Steven Sharrer, and Plaintiff California Nurses Association ("CNA"), (collectively, the "Parties"), hereby enter into this stipulation (the "Stipulation") based on the following recitals of fact:

RECITALS

A. On March 5, 2020, Plaintiff CNA filed its *Complaint For Damages, Civil Penalties, Attorneys Fees* [Docket No. 1] (the "Complaint").

B. On March 20, 2020, Plaintiff CNA filed a *Notice of Motion and Motion of Plaintiff for Withdrawal of Reference of Adversary Proceedings Pending in Bankruptcy Court* [Docket No. 9] (the "Motion to Withdraw Reference").

C. The Motion to Withdraw Reference is set for hearing on April 20, 2020, at 1:30 p.m., in Courtroom 10A, located at 350 W. 1st Street, 10th Floor, Los Angeles, California 90012.

D. On March 19, 2020, Governor Gavin Newsom issued Executive Order N-33-20 (the "Executive Order"),[1] following his proclamation on March 4, 2020 of a State of Emergency to exist in California as a result of the threat of COVID-19. The Executive Order directed that "all individuals living in the State of California to stay home or at their place of residence except as needed to maintain continuity of operations of the federal critical infrastructure sectors."

Case 2:20-cv-02523-SVW Document 10 Filed 03/30/20 Page 2 of 2 Page ID #:155

[1] *See* https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf (last visited on Mar. 26, 2020).

E. Central District Chief Judge Virginia A. Phillips has ordered the Continuity of Operations ("COOP") Plan for the Central District of California, effective March 23, 2020 through May 1, 2020. Pursuant to the COOP Plan, "In civil cases, no hearings will go forward except for emergency time sensitive matters, such as requests for temporary restraining orders and preliminary injunctions, as ordered by the assigned judicial officer."[2]

F. Defendants operate general acute care hospitals and are highly focused on addressing the COVID-19 pandemic, as are other hospitals throughout the Country. For example, last week, the Debtors obtained approval from the Bankruptcy Court to enter into a lease with the State of California for its use of SVMC 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* [Bankruptcy Docket No. 4328].

G. Defendants requested that Plaintiff agree to an extension given their priorities and efforts in the COVID-19 pandemic and their chapter 11 cases.

H. The Plaintiff and Defendants have agreed to continue the hearing for the Motion to Withdraw Reference from April 20, 2020 at 1:30 p.m., to May 11, 2020, at 1:30 p.m. in Courtroom 10A, located at 350 W. 1st Street, 10th Floor, Los Angeles, California 90012.

Case 2:20-cv-02523-SVW Document 10 Filed 03/30/20 Page 3 of 5 Page ID #:153

I. In accordance with Local Rule 7-9 through 7-11, the Parties have agreed that Defendants' Opposition briefs to the Motion to Withdraw Reference is due on April 20, 2020, and Plaintiff's Reply brief to the Motion to Withdraw Reference is due on April 27, 2020.

[2] https://www.cacd.uscourts.gov/sites/default/files/documents/Order_20-042.pdf (last visited on Mar. 26, 2020)

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

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

AGREEMENT

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

1. The deadline for Defendants to file their Opposition briefs to the Motion to Withdraw Reference shall be extended from March 30, 2020 to April 20, 2020.

2. The deadline for Plaintiff to file its Reply brief to the Motion to Withdraw Reference shall be extended from April 6, 2020 to April 27, 2020.

3. The hearing on the Motion to Withdraw Reference shall be continued from April 20, 2020 at 1:30 p.m. to May 11, 2020 at 1:30 p.m.

4. The Stipulation shall be without prejudice to any party seeking further extensions of time from the Court.

IT IS SO STIPULATED.

Dated: March , 2020

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

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

Counsel for Verity Health Systems of California, Inc., *et al.* and DePaul Ventures, LLC

Case 2:20-cv-02253-SVW Document 10 Filed 03/30/20 Page 4 of 5 Page ID #:154

Dated: March __, 2020

BARTKO ZANKEL BUNZEL
AN N. RUDA
LOUISE ANN FERNANDEZ

By: */s/Louise Ann Fernandez*
Louise Ann Fernandez

Counsel for Richard Adcock and Steven Sharrer

Dated: March __, 2020

CALIFORNIA NURSES ASSOCIATION
CAROL A. IGOE
KYRSTEN B. SKOGSTAD
NICOLE J. DARO

By: */s/Kyrsten B. Skogstad*
Kyrsten B. Skogstad

Counsel for California Nurses Association

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Tania M. Moyron, 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/Tania M. Moyron

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

Case 8:20-cv-00253-SVW Document 10 Filed 03/30/20 Page 5 of 5 Page ID #:152

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

In re VERITY HEALTH SYSTEM OF CALIFORNIA, INC., *et al*. Debtors and Debtors in Possession.	Case No.: 2:20-cv-02623-SVW Bankr. Lead Case No.: 2:18-bk-20151-ER Adversary Proceeding Case No.: 2:20-ap-1051-ER Hon. Stephen V. Wilson
California Nurses Association CNA, Plaintiff, v. Verity Health System of California, Inc., *et al.* Defendant(s).	**[PROPOSED] ORDER APPROVING STIPULATION TO CONTINUE HEARING DATE OF MOTION TO WITHDRAW REFERENCE AND RELATED BRIEFING SCHEDULE**

Case 2:20-cv-02623-SVW Document 10-1 Filed 03/30/20 Page 1 of 2 Page ID #:158

The Court having considered the "*Stipulation Continuing Hearing Date Of Motion To Withdraw Reference And Related Briefing Schedule*"[1] entered into by and between Defendants Verity Health System, Inc., *et al*. ("Verity"), DePaul Ventures, LLC, Richard Adcock, Steven Sharrer, and Plaintiff California Nurses Association ("CNA"), and good cause appearing,

HEREBY ORDERS AS FOLLOWS:

A. The deadline for Defendants to file their Opposition briefs to the Motion to Withdraw Reference shall be extended from March 30, 2020 to April 20, 2020.

B. The deadline for Plaintiff to file its Reply brief to the Motion to Withdraw Reference shall be extended from April 6, 2020 to April 27, 2020.

C. The hearing on the Motion to Withdraw Reference shall be continued from April 20, 2020 at 1:30 p.m. to May 11, 2020 at 1:30 p.m.

D. The Stipulation shall be without prejudice to any party seeking further extensions of time from the Court.

IT IS SO ORDERED.

Dated: March __, 2020

Hon. Stephen V. Wilson
UNITED STATES DISTRICT JUDGE

Case 2:20-cv-02323-SVW Document 10-1 Filed 03/30/20 Page 2 of 2 Page ID #:152

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