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 Plaintiffs and Chapter 11 Debtors and Debtors In Possession

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION - LOS ANGELES

In re

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

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,

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.

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

Hon. Dale S. Fischer

JOINT STIPULATION TO EXTEND TIME FOR PLAINTIFFS' OPPOSITION TO THE MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

[Filed concurrently with [Proposed] Order]

Original Opposition Deadline: July 20, 2020
New Opposition Deadline: July 21, 2020

Discovery Cut-off:	TBD
Last Day for Hearing Motions:	TBD
Pre-trial Conference:	TBD
Trial Date:	TBD

18201512007170000000000078

a Nevada Corporation, KPC GLOBAL MANAGEMENT, LLC, a California Limited Liability Company, and DOES 1 through 500,

Defendants.

Plaintiffs Verity Health System of California, Inc. ("VHS"), St. Vincent Medical Center and its wholly-owned subsidiary, St. Vincent Dialysis Center, Inc. ("collectively, St. Vincent"), St. Francis Medical Center ("St. Francis"), Seton Medical Center ("Seton," and together with St Francis and St. Vincent, the "Plaintiff Hospitals" or the "Hospitals"), and Verity Holdings, LLC ("Verity Holdings"), and the Chapter 11 Debtors and Debtors in Possession (collectively, the "Debtors" or "Plaintiffs"), and Defendants Strategic Global Management, Inc. ("SGM"), Kali P. Chaudhuri, M.D., KPC Healthcare Holdings, Inc., KPC Health Plan Holdings, Inc., KPC Healthcare, Inc., and KPC Global Management, LLC, (collectively, "Defendants") hereby enter into this stipulation (the "Stipulation") based on the following recitals of fact:

RECITALS

1. Defendants filed a Motion to Dismiss Plaintiffs' First Amended Complaint ("Motion to Dismiss") on July 10, 2020 [2:20-cv-00613-DSF, Docket No. 39]. The Motion to Dismiss is set for hearing on August 10, 2020, at 1:30 p.m.

2. Pursuant to Local Rule 7-9, Plaintiffs' Opposition to the Motion to Dismiss ("Opposition") is due on July 20, 2020. Plaintiffs' lead trial counsel is unavailable on a previously scheduled vacation from July 10, 2020 to July 15, 2020, with scheduled court appearances on July 16 and July 17, 2020. On July 14, 2020 counsel for Plaintiffs requested an extension of time to file the Opposition and Defendants explained their concerns about delaying the resolution of the Motion to Dismiss

3. As a compromise, Defendants agreed to extend the deadline for Plaintiffs to file the Opposition to the Motion to Dismiss by one day to July 21, 2020 (which will cut

a day from Defendants' time to prepare a reply) and Plaintiffs agreed that they would allow the Motion to proceed on August 10, 2020.

4. No prior requests for an extension of time for Plaintiffs to file an Opposition to the Motion to Dismiss have been requested.

STIPULATION

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

1. The deadline for Plaintiffs to file their Opposition to the Motion to Dismiss shall be extended from July 20, 2020 to July 21, 2020.

2. No other deadlines shall be affected by this Stipulation. Defendants' Reply deadline will remain July 27, 2020 and the hearing date will remain on August 10, 2020.

3. The Parties reserve all rights to raise any and all arguments in support of or in opposition to the relief requested in the Motion to Dismiss.

IT IS SO STIPULATED.

Dated: July 16, 2020

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

By: /s/ *Sonia R. Martin*
Counsel to Plaintiffs and Chapter 11 Debtors and Debtors In Possession

Dated: July 16, 2020

BARNES & THORNBURG LLP
KEVIN D. RISING
RACHEL LERMAN
JOEL R. MEYER

By: /s/ *Joel R. Meyer*
Counsel for Defendants, Strategic Global Management, Inc., *et al.*

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Sonia R. Martin, 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/ *Sonia R. Martin*
Sonia R. Martin

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION - LOS ANGELES

In re

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

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,

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.

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

Hon. Dale S. Fischer

[PROPOSED] ORDER APPROVING JOINT STIPULATION TO EXTEND TIME FOR PLAINTIFFS' OPPOSITION TO THE MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

[Filed concurrently with Joint Stipulation]

Original Opposition Deadline: July 20, 2020
New Opposition Deadline: July 21, 2020

The Court, having considered the Joint Stipulation to Extend Time for Plaintiffs' Opposition to the Motion to Dismiss the First Amended Complaint, and good cause having been shown, **GRANTS** the Joint Stipulation and

HEREBY ORDERS AS FOLLOWS:

1. The deadline for Plaintiffs to file an Opposition to Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint shall be extended from July 20, 2020 to July 21, 2020.
2. The deadline for Defendants to file a Reply remains July 27, 2020.
3. The hearing date for the Motion to Dismiss Plaintiffs' First Amended Complaint remains August 10, 2020.
4. The Joint Stipulation shall be without prejudice to the Parties' rights to raise any and all arguments in support of or in opposition to the relief requested in the Motion to Dismiss Plaintiffs' First Amended Complaint.

IT IS SO ORDERED.

Dated: July __, 2020

_____
Honorable Dale S. Fischer
UNITED STATES DISTRICT JUDGE