Docket #6998 Date Filed: 10/13/2026

FILED
OCT 13 2026
CLERK U.S. BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
BY: Deputy Clerk

Lindsey E. Chow (Original Creditor)
William C. Chow
1662 ½ Cortez Street
Los Angeles, California 90026
310-728-9909
Plaintiff & Creditor in Pro Per in Original Action

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

LINDSEY E. CHOW, an individual, and

WILLIAM C. CHOW, an individual, Plaintiff in Pro Per

vs.

VERITY HEALTH SYSTEM OF CALIFORNIA, et al.

(Owner & Operator of St. Vincent Medical Center – Parent Company)

Case No.: 2:18-bk-20151-BB

Chapter 11 Liquidating

Adversary Case No.:

ADVERSARY MEDICAL TORT COMPLAINT FOR:

1. **WRONGFUL DEATH**
2. **FRAUD**
3. **ELDER ABUSE**
4. **SURVIVORSHIP**
5. **MEDICAL BATTERY**
6. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
7. **VIOLATION OF INFORMED CONSENT**

DEMAND FOR A JURY TRIAL (DISTRICT COURT)

HEARING DATE: [To Be Requested]
TIME: [To Be Requested]
PLACE: COURTROOM
JUDGE:

COMPLAINT

Plaintiff, pro se, Lindsey E. Chow (Original Plaintiff & Creditor) alleges as follows:

COMPLAINT FOR MEDICAL BATTERY, INTENTIONAL INSTITUTIONAL ELDER AUBSE, FRAUDULENT CONCEALMENT, AND NON-DISCHARGEABILITY OF DEBT

1820151261013000000000001

Plaintiff Lindsey E. Chow, appearing *Pro Se* individually and as the designated Successor-in-Interest and representative of the Estate of Henry Ngain Chow ('Decedent'), hereby files this Adversary Complaint against Defendants Verity Health System of California, Inc., and Howard Grobstein, in his official capacity as Chapter 11 Liquidating Trustee (collectively, "Defendants"), and respectfully alleges as follows:

I. JURISDICTION AND VENUE

1. This Adversary Proceeding is a non-core, personal injury tort and wrongful death action pursuant to **28 U.S.C. § 1334** and **28 U.S.C. § 157(b)(5)**.
2. Plaintiff does **NOT** consent to the entry of final orders or judgment by the Bankruptcy Court under *Stern v. Marshall*, 564 U.S. 462 (2011). Plaintiff explicitly demands an Article III Federal District Judge adjudicate this matter to final judgment.
3. Plaintiff hereby demands a **trial by jury** in the United States District Court.

4. **"V. VIOLATION OF FEDERAL PATIENT RIGHTS AND SAFETY STANDARDS**

Plaintiff further alleges that Defendant's actions constituted an absolute violation of federal hospital conditions of participation, including 42 CFR § 482.13(b)(2) (the absolute right to refuse treatment and informed consent), 42 CFR § 482.13(b)(3) (the right to be free from unauthorized chemical restraints), and 42 CFR § 482.13(c)(1) (the right to a safe environment). These structural violations directly facilitated the unauthorized, financially motivated termination of life described herein."

1. The Right to Patient Autonomy and Consent

- **Cite 42 CFR § 482.13(b)(2) — Right to Informed Consent:** This federal mandate explicitly states that a patient has the right to make informed decisions regarding their care, including the right to formulate advance directives and the **right to refuse treatment**. By administering an unconsented chemical sedation to silence his breathing while he was conscious, the staff committed a direct federal regulatory violation.

- **Cite 42 CFR § 482.13(b)(3) — Right to Freedom from Restraints:** Federal law strictly prohibits the use of restraints of any kind—including **chemical restraints** like unauthorized sedatives—unless explicitly necessary to ensure physical safety. Using a drug to silence an unmonitored patient for the staff's convenience violates this core federal right.

2. The Mandate for Hospital Safety and Monitoring

- **Cite 42 CFR § 482.13(c)(1) — Right to a Safe Environment:** This statute guarantees every patient the right to receive care in a safe setting. Leaving a critically ill postoperative patient completely unplugged from heart monitors, alarms, and ventilators in a closed-door corner bed is a total abandonment of federal hospital safety standards.

II. RELEVANT LITIGATION HISTORY & ISSUE PRECLUSION

4. On April 9, 2019, Federal Bankruptcy Judge Ernest Robles issued an Omnibus Order (**Exhibit A**, page 40).

5. Following a thorough review of the medical records, timeline, and statistical evidence, Judge Robles formally found **"good cause appearing thereof"** that the Plaintiff 's decedent father, Henry Ngain Chow or Mr. Chow was **"euthanized as a cost-saving measure."** ***See*** *Exhibit 1: Judge Ernest Robles' Order pages 37- 42 within Omnibus Order with 2 Introductory Pages/Order*

6. Under the doctrine of **issue preclusion and law of the case**, the core nature of this action—as an intentional, financially motivated destruction of human life—has already been adjudicated on the merits by a federal court.

7. The state trial court's subsequent summary judgment attempting to restrict this action solely to a minor, individual NIED claim represents a direct, lawless subversion of Judge Robles's standing federal findings, causing severe **procedural disorder and systemic confusion**.

III. STATEMENT OF FACTS

1. At all times relevant, the Decedent Henry Ngain Chow was an elderly Medicare beneficiary admitted on October 31, 2015 to a medical facility operated, owned, or under the direct corporate liability of Defendant Verity Health System of California, Inc.

2. Despite the Decedent's explicit, communicated desire to continue living and resist the termination of his life, Defendants engaged in a systematic, profit-driven corporate protocol designed to maximize Medicare billing milestones by forcing terminal weaning, and other intrusive, highly compensated procedures upon a vulnerable patient without informed consent.

3. The Decedent was subjected to forced, non-consensual surgeries, forced mechanical ventilation, and force physical catheterization. His limbs were physically restrained to prevent his escape or resistance to these corporate billing maneuvers.

4. As a direct result of the forced mechanical intubation, the Decedent's throat was severely destroyed and lacerated, completely stripping a kind, honorable man of his human voice and his absolute right to speak in his final hours. Moreover, when Lindsey Chow saw his gasping for oxygen she pleaded with two (2) doctors and a nurse for help, which they refused to render aid or oxygen and worse still, the nurse came to him to impose anesthesia so he would die faster as he was already in a state of sheer terror and anguish and physical pain seeing his flesh had turned a medium shade of grey and was cold to Lindsey Chow's touch in his final hours.

5. In his final hours on Friday, November 6, 2015 at 1:25 a.m., realizing that his life was being intentionally denied and rationed for corporate profit, the Decedent experienced severe physical agony.

6. Because his voice was destroyed by the intubation and his hands were shaking too severely to write or articulate his desperate words, the Decedent resorted to desperate, physical struggles against his

restraints by twisting the bedsheets to the point his penis was exposed or he may have been trying to escape his captors.

7. Immediately upon the exhaustion and running out of the Decedent's federal Medicare benefits, Defendants abruptly pulled the ventilator plug, heart monitor, and all associated alarms to prevent a timely CODE BLUE to save his life.

8. True informed consent was completely absent and rendered void ab initio because Defendants intentionally concealed their economic motives, resource allocation,

IV. CAUSES OF ACTION

COUNT 1: WRONGFUL DEATH

Henry Ngain Chow underwent surgery upon arrival of hospital against his consent and will as well as bodily autonomy, patient rights. He ended up with infections leading to sepsis.

COUNT 2: FRAUD (MEDICARE)

Henry Ngain Chow's admitting doctor, Jagdeep Tung, asked Lindsey Chow the day before or the day before that morning Defendant's medical staff executed violation of U.D.D.A. that was denying ventilator oxygen. Lindsey Chow and William Chow witnessed his struggles to breathe as anesthesia was administered against his wishes to continue living causing him to fall asleep without returning life saving oxygen. All his alarms were turned off and heart monitor was wheeled away.

COUNT 3: ELDER ABUSE

As Honorable Judge Ernest Robles' Order said, "good cause appearing thereof" in granting our Reliefs from Stays without limiting the cap on damages in his own words – words of a veteran judge with the highest level of esteem– described this case as "Mr. Chow" "was euthanized as a cost-saving measure" of page 38 of 66. He was forced to die against his will; there is nothing more horrific than that within the course of a day.

COUNT 4: SURVIVORSHIP

Under the Rule of Law, a cause of action does not extinguish due to a death especially by murder and other intentional, criminal acts. My mother was Successor-in-Interest but she died three years after commencement of suit due to grief and loss of companionship. Decendent's children of Lindsey E. Chow and William C. Chow are his only surviving issue and we are in agreement that I, Lindsey E. Chow, should represent his estate. The estate of a man whom lived honestly, did not oppress anyone, and did not deserve for his life to be disposed of by state court judge that claimed that we needed a medical expert to prove the need for oxygen and the need for expert testimony that several days of inability to urinate due to an urinary catheter malfunctioning that the hospital staff refused to address causing his kidneys to be crushed by toxins. Everyone has experienced the need for relief especially after extended hours of not being able to do so. Henry Chow was unable to urinate for days.

COUNT 5: MEDICAL BATTERY

About the time his Medicare Advantage under Social Security Program depleted, Decedent suffered extraordinary denial of all care within definitions of involuntary euthanasia. That is to say, his ventilator oxygen was unplugged and all available and associated alarms were unplugged leaving ICU room silent. A door was closed to prevent visitors from seeing him struggle for breath in absolute terror. After his body was broken with signs of his flesh a medium shade of grey and clear sign he would expire soon, hospital staff in the late hours of that day executed a "Code Blue" knowing it was useless. There is a medical record in the middle of when he was being denied ventilator oxygen that their treatment was "successful".

COUNT 6: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Being forced to die within a day, combined with absolute mental clarity is within definitions of Elder Abuse as he was elderly and I.I.E.D. Further, as he was unable to breath a hospital staff

administered anesthesia to destroy his last chance to look into the eyes of his children depriving all last communications and final ability to see his loved ones. His children saw him struggle to stay awake. He would later flat-line twice before dying.

COUNT 7: VIOLATION OF INFORMED CONSENT

Henry Chow did not consent to the surgery that was high risk. He did not consent to having a ventilator hooked up to him. He did not consent to an urinary catheter which was non-microbial and IT FAILED, MALFUNCTIONED, so he was unable to urinate for days. After 12 to 24 hours, a person's kidneys would be crushed; he suffered DAYS WITHOUT RELIEF.

PRAYER FOR RELIEF

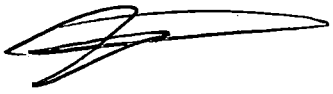
WHEREFORE, Plaintiff demands judgment against Defendant for uncapped compensatory damages, punitive damages, and any other relief a federal jury deems just.

Dated: October 12, 2026

Respectfully submitted,



Lindsey E. Chow, Plaintiff Pro Se
1662 ½ Cortez Street
Los Angeles, California 90026



William C. Chow, Plaintiff Pro Se
1664 ½ Cortez Street
Los Angeles, California 90026

EXHIBITS

1. Order of Honorable Judge Ernest Robles – Exhibit 1– See pages 37 – 43
2. Death Certificate – Exhibit 2
3. Hernry Ngain Chow's "Uhelpme" and "Urine" written pleas for help
4. Medical Record of Registered Nurse Teresa Cannon – Exhibit 2
5. Medical Records of Terminal Weaning Timeline – Exhibit 3

VERIFICATION

I, Lindsey E. Chow, declare as follows:

1. I am the Plaintiff (Pro Se) and the lawful Successor-in-Interest and representative of the Estate of Henry Ngain Chow, the Decedent herein.
2. I have read the foregoing Adversarial Complaint and know the contents thereof.
3. The physical facts, corporate billing actions, signs of bodily trauma, and non-consensual medical interventions detailed therein are true of my own personal knowledge, observations, and review of the records. Particularly, I witnessed the torture and anguish of my late father force to die within hours when he was gasping excruciatingly for each breath, each second while denied oxygen for over a day. My brother, William Chow, also witnessed our late father's suffering when he was unable to urinate for many hours if not days.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of October, 2026, at Los Angeles, California.

Lindsey E. Chow, Plaintiff Pro Se

William C. Chow, Plaintiff Pro Se

Appendix E

SAMUEL R. MAIZEL (Bar No. 189301)
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Attorneys for the Chapter 11 Debtors and Debtors In Possession

FILED & ENTERED

APR 09 2019

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY gonzalez DEPUTY CLERK

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LOS ANGELES, CALIFORNIA 90017-5704
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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES 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 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.

Lead Case No. 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
Case No. 2:18-bk-20179-ER
Case No. 2:18-bk-20180-ER
Case No. 2:18-bk-20181-ER

Chapter 11 Cases
Hon. Ernest M. Robles

ORDER ON NOTICES OF MOTIONS AND MOTIONS FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (ACTION IN NON-BANKRUPTCY FORUM) FILED BY SUSAN CHAN CHOW AND LINDSEY CHOW

Hearing:
DATE: April 3, 2019
TIME: 10:00 a.m.
PLACE: Courtroom 1568
255 East Temple Street
Los Angeles, California 90012-3300

The *Notices Of Motions And Motions For Relief From The Automatic Stay Under 11 U.S.C. § 362 (Action In Non-Bankruptcy Forum) Filed By Susan Chan Chow And Lindsey Chow* [Docket Nos. 1614 and 1629] (the "Motions"), came on regularly for hearing at 10:00 a.m. on April 1, 2019, before the Honorable Ernest M. Robles, United States Bankruptcy Judge, in Courtroom 1568, United States Bankruptcy Court, Edward R. Roybal Building, 225 E. Temple Street, Los Angeles, California 90012. Lindsey Chow appeared *in pro per*. John A. Moe, II, of Dentons US LLP, appeared on behalf of Debtors, Verity Health System of California, Inc., and St. Vincent Medical Center. Having reviewed the Motions, the *Debtors' Response To Motion For Relief From The Automatic Stay Under 11 U.S.C. § 362 Filed By Susan Chan Chow And Lindsey Chow* and the accompanying *Declarations of Janee Tomlinson and Andrew Wachtel, M.D.* [Docket No. 1835], and the *Answer To Debtors' Response To Our Motion For Relief From The Automatic Stay* [Docket No. 1900], the statements of Lindsey Chow and John A. Moe, II, at the hearing, and for the reasons set forth in the Court's tentative rulings (Docket Nos. 2035 and 2034), which the Court adopts as its final rulings and which are incorporated by reference, and good cause appearing therefor,

IT IS HEREBY ORDERED that the Motions for relief from the automatic stay are granted, effective July 19, 2019.

###

Date: April 9, 2019

Ernest M. Robles
United States Bankruptcy Judge

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

United States Bankruptcy Court
Central District of California
Los Angeles
Judge Ernest Robles, Presiding
Courtroom 1568 Calendar

Wednesday, April 3, 2019 **Hearing Room 1568**

10:00 AM
2:18-20151 Verity Health System of California, Inc. **Chapter 11**

#14.00 Hearing
RE: [1629] Notice of motion and motion for relief from automatic stay with supporting declarations ACTION IN NON-BANKRUPTCY FORUM RE: Susan Chan Chow, et al. v. Ma Leyba, et al. (St. Vincent) BC648838 .

FR. 4-1-19

Docket 1629

Tentative Ruling:

4/2/2019

For the reasons set forth below, the Motions are GRANTED; however, the order granting the Motions shall not take effect until **July 19, 2019.**

Pleadings Filed and Reviewed:
1) Notice of Motion and Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 [as to Debtor Verity Health System, Inc.] [Doc. No. 1614]
2) Notice of Motion and Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 [as to Debtor St. Vincent Medical Center] [Doc. No. 1629]
3) Official Committee of Unsecured Creditors' Response to Motions for Relief from Stay (Non-Bankruptcy Forum) Filed by Susan Chan Chow and Lindsey Chow [Doc. No. 1834]
4) Debtors' Response to Motion for Relief from the Automatic Stay Filed by Susan Chan Chow and Lindsey Chow [Doc. No. 1835]
5) Answer to Debtor's Response to Our Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 and § 523(a)(6) and § 523(a)(4) [Doc. No. 1900]

I. Facts and Summary of Pleadings

On August 31, 2018 (the "Petition Date"), Verity Health Systems of California ("VHS") and certain of its subsidiaries filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. On August 31, 2018, the Court entered an order granting the Debtors' motion for joint administration of the Debtors' Chapter 11

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CONT... Verity Health System of California, Inc. **Chapter 11**

cases. Doc. No. 17.

Susan Chan Chow and Lindsey Chow ("Movants"), proceeding *in pro se*, seek stay-relief, pursuant to § 362(d)(1), for the purpose of continuing to litigate an action for wrongful death, medical malpractice, and negligent infliction of emotional distress against Debtors St. Vincent Medical Center ("St. Vincent") and Verity Health System, Inc. ("VHS") (collectively, the "Debtors") in the Los Angeles Superior Court (the "State Court Action"). The State Court Action was filed on January 31, 2017. Prior to the Petition Date, St. Vincent and VHS filed Demurrers and Motions to Strike; as a result, Movants have been required to file First, Second, Third, and Fourth Amended Complaints. A hearing on a Demurrer and Motion to Strike filed by St. Vincent and VHS with respect to the Fourth Amended Complaint was set for September 12, 2018, but was taken off calendar as a result of the bankruptcy filing.

In support of the Motions, Movants allege, *inter alia*, that the Debtors euthanized Henry Chow (the father of Movant Lindsey Chow and the spouse of Movant Susan Chow) as a cost-saving measure.

Debtors dispute Movants' allegations with respect to Mr. Chow's death. Debtors oppose stay-relief at this time, explaining that they would be required to spend significant time defending against the State Court Action if the stay were lifted. Debtors request that the stay remain in place until October 15, 2019, so that the Debtors can focus upon selling their remaining hospitals.

For the same reasons, the Official Committee of Unsecured Creditors (the "Committee") asserts that the Motion should be denied without prejudice.

In their Reply in support of the Motions, Movants request that the Bankruptcy Court conduct a jury trial of the claims asserted in the State Court Action in June or July. Movants assert that Mr. Chow died under suspicious circumstances and that a speedy trial is necessary to protect the public.

II. Findings and Conclusions

The Court declines to conduct a jury trial of the claims asserted in the State Court Action. The State Court is the forum best suited to adjudicate Movants' claims, which all arise under non-bankruptcy law. Further, the State Court is already intimately acquainted with this matter, having ruled upon multiple Demurrers and Motions to Strike filed by the Debtors.

As explained by the Ninth Circuit Bankruptcy Appellate Panel in *Kronemyer v. American Contractors Indemnity Co. (In re Kronemyer)* (internal citations omitted): "What constitutes 'cause' for granting relief from the automatic stay is decided on a

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CONT... Verity Health System of California, Inc. **Chapter 11**

case-by-case basis. Among factors appropriate to consider in determining whether relief from the automatic stay should be granted to allow state court proceedings to continue are considerations of judicial economy and the expertise of the state court, ... as well as prejudice to the parties and whether exclusively bankruptcy issues are involved." 405 B.R. 915, 921. The factors articulated in *In re Curtis*, 40 B.R. 795, 799-800 (Bankr. D. Utah 1984) and adopted by the bankruptcy court in *Truebro, Inc. v. Plumberex Specialty Prods., Inc. (In re Plumberex Specialty Prods., Inc)*, 311 B.R. 551, 559-60 (Bankr. C.D. Cal. 2004) are also "appropriate, nonexclusive factors to consider in deciding whether to grant relief from the automatic stay to allow pending litigation to continue in another forum." *Kronemyer*, 405 B.R. at 921. The *Curtis* factors are as follows:

1) Whether the relief will result in a partial or complete resolution of the issues;
2) The lack of any connection with or interference with the bankruptcy case;
3) Whether the foreign proceeding involves the debtor as a fiduciary;
4) Whether a specialized tribunal has been established to hear the particular cause of action and whether that tribunal has the expertise to hear such cases;
5) Whether the debtor's insurance carrier has assumed full financial responsibility for defending the litigation;
6) Whether the action essentially involves third parties, and the debtor functions only as a bailee or conduit for the goods or proceeds in question;
7) Whether the litigation in another forum would prejudice the interests of other creditors, the creditors' committee and other interested parties;
8) Whether the judgment claim arising from the foreign action is subject to equitable subordination under Section 510(c);
9) Whether movant's success in the foreign proceeding would result in a judicial lien avoidable by the debtor under Section 522(f);
10) The interests of judicial economy and the expeditious and economical determination of litigation for the parties;
11) Whether the foreign proceedings have progressed to the point where the parties are prepared for trial, and
12) The impact of the stay on the parties and the "balance of hurt."

Plumberex, 311 B.R. at 599.

The most important of the twelve factors is the effect of the non-bankruptcy litigation on the administration of the estate. *Curtis*, 40 B.R. at 806. The *Curtis* court

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held that "[e]ven slight interference with the administration may be enough to preclude relief in the absence of a commensurate benefit." *Id.*

Because Movants have not agreed to limit recovery to insurance, granting stay-relief at this time would require the Debtors to defend against the State Court Action. Although it would certainly be possible for the Debtors to mount a defense at this time, requiring them to do so would nonetheless interfere with the case by distracting the Debtors' professionals from other pressing matters. While it is true that primary responsibility for the Debtors' defense could be assigned to special litigation counsel, the Debtors' general bankruptcy counsel would still be required to monitor the litigation.

An auction of four of the Debtors' hospitals is set to occur on April 8–9, with a hearing to approve the results of the auction set for April 17, 2019. To successfully prosecute the case for the benefit of creditors, Debtors will be required to devote substantial resources to the auction and the subsequent hearing to approve the results of the auction. Granting stay-relief at this juncture would require the Debtors to divert their attention from issues pertaining to the sale, which would be detrimental to creditors. Even after the auction has been completed, Debtors will be required to devote substantial attention to issues arising in connection with the California Attorney General's review of the sale.

In view of the findings set forth above, *Curtis* factors two, five, seven, and eleven weigh against granting stay-relief at this time. Although the relevant *Curtis* factors do not warrant stay-relief now, stay-relief will be warranted as of **July 19, 2019.**

Granting stay-relief now would interfere with the bankruptcy case by distracting the Debtors' professionals from other pressing matters (the second *Curtis* factor). With respect to factor five, the damages sought in the State Court Action are substantial; Movants have not agreed to limit recovery to applicable insurance; and it is therefore not known whether available insurance proceeds will be sufficient to cover any judgment Movants may obtain. Factor five therefore weighs against granting immediate stay-relief. The litigation's interference with the case has the potential to reduce creditor recoveries; therefore, factor seven weighs against granting immediate stay-relief. The State Court Action has not reached the trial stage, so factor eleven also weighs against granting immediate stay-relief.

Factor twelve—the balance of the hurt—weighs in favor of the Debtors. As discussed, granting immediate stay-relief will harm the Debtors by distracting the Debtors' professionals from other pressing matters. On the other hand, the Court acknowledges that Movants will suffer some prejudice as a result of further delay.

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However, in assessing the prejudice to Movants, the Court notes that Movants have not yet succeeded in putting the claims in the State Court Action at issue, even though the action was filed approximately eighteen months before the Petition Date. Given this fact, the prejudice to the Debtors from granting the Motion now outweighs the prejudice to Movants resulting from some additional delay.

To the extent that they apply, the remaining *Curtis* factors weigh in favor of immediate stay-relief. The State Court Action will completely resolve the issues (factor one); the State Court is a the tribunal best suited to hear the Movant's claims (factor three); and lifting the stay would result in a more expeditious determination of the State Court Action (factor ten). Nonetheless, these factors are outweighed by the harm that immediate stay-relief would impose upon the Debtors.

Having considered the applicable *Curtis* factors, the Court finds that Movants are entitled to stay-relief, effective as of **July 19, 2019**. This result gives the Debtors some breathing space to achieve their objectives, while at the same time delaying Movants' ability to proceed with the State Court Action only briefly.

III. Conclusion

Based upon the foregoing, the Motions are GRANTED; however, the order granting the Motion shall not take effect until **July 19, 2019**. Debtors shall submit an order, incorporating this tentative ruling by reference, within seven days of the hearing.

No appearance is required if submitting on the court's tentative ruling. If you intend to submit on the tentative ruling, please contact Jessica Vogel or Daniel Koontz at 213-894-1522. **If you intend to contest the tentative ruling and appear, please first contact opposing counsel to inform them of your intention to do so.** Should an opposing party file a late opposition or appear at the hearing, the court will determine whether further hearing is required. If you wish to make a telephonic appearance, contact Court Call at 888-882-6878, no later than one hour before the hearing.

Party Information

Debtor(s):

Verity Health System of California, Represented By
Samuel R Maizel
John A Moe II

United States Bankruptcy Court
Central District of California
Los Angeles
Judge Ernest Robles, Presiding
Courtroom 1568 Calendar

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10:00 AM
CONT... **Verity Health System of California, Inc.** **Chapter 11**

Tania M Moyron
Claude D Montgomery
Sam J Alberts
Shirley Cho
Patrick Maxcy

United States Bankruptcy Court
Central District of California
Los Angeles
Judge Ernest Robles, Presiding
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10:00 AM
2:18-20151 **Verity Health System of California, Inc.** **Chapter 11**

#15.00 Hearing
RE: [1614] Notice of motion and motion for relief from automatic stay with supporting declarations ACTION IN NON-BANKRUPTCY FORUM.

FR. 4-1-19

Docket 1614

Tentative Ruling:

4/2/2019

See Cal. No. 14, above, incorporated in full by reference.

Party Information

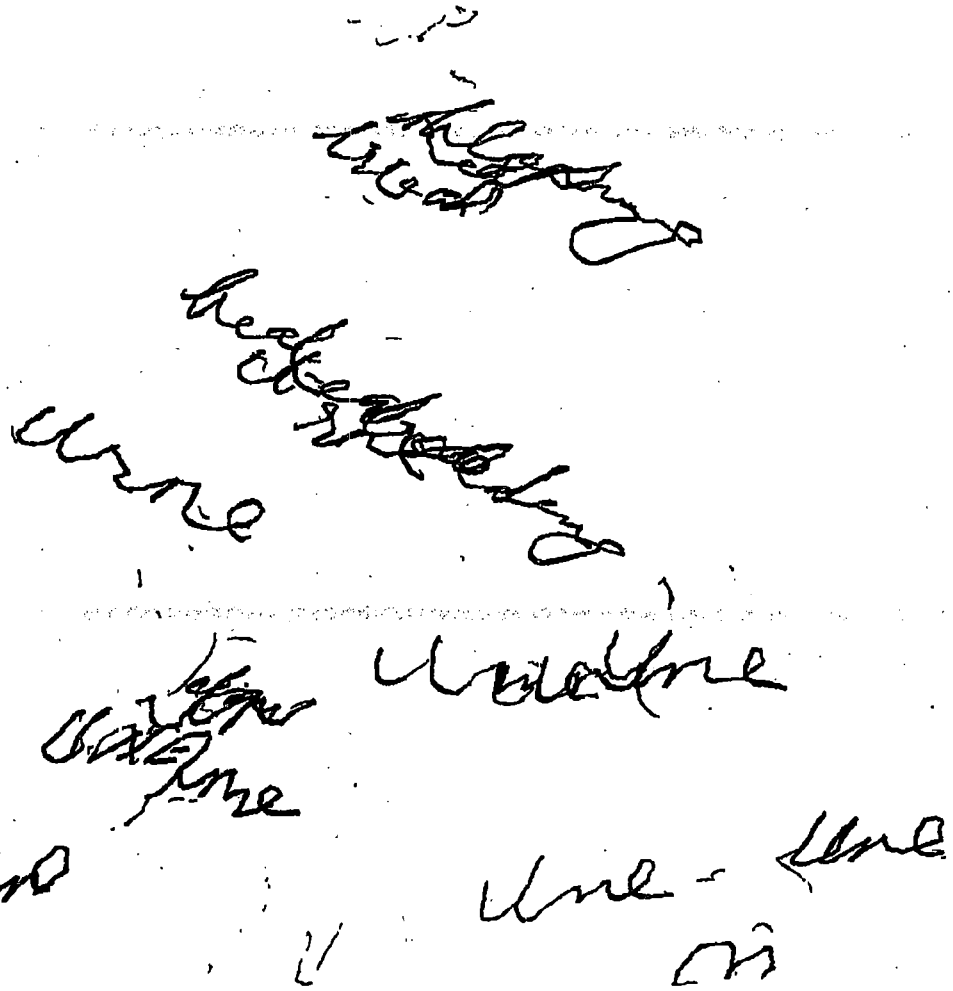
Debtor(s):

Verity Health System of California, Represented By
Samuel R Maizel
John A Moe II
Tania M Moyron
Claude D Montgomery
Sam J Alberts
Shirley Cho
Patrick Maxcy

Appendix F

Henry's scribbles

"Uhelp me"



APPENDIX G

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC HEALTH

3052015235105 — CERTIFICATE OF DEATH — 3201519052827

1. NAME OF DECEDENT - FIRST	HENRY
2. MIDDLE	NGAIN
3. LAST (FAMILY)	CHOW
4. DATE OF BIRTH	07/29/1938
5. AGE	77
6. SEX	M
9. BIRTHPLACE (STATE OR FOREIGN COUNTRY)	BURMA
11. EVER IN U.S. ARMED FORCES	YES [X] NO
12. MARITAL STATUS	MARRIED
7. DATE OF DEATH	11/06/2015
8. HOUR	0125
13. EDUCATION	09
16. DECEDENT'S RACE	CHINESE
17. USUAL OCCUPATION	ENGINEER
18. KIND OF BUSINESS OR INDUSTRY	GOVERNMENT
19. YEARS IN OCCUPATION	15
20. DECEDENT'S RESIDENCE	1662 1/2 CORTEZ ST
21. CITY	LOS ANGELES
22. COUNTY	LOS ANGELES
23. ZIP CODE	90026
24. YEARS IN COUNTY	40
25. STATE/FOREIGN COUNTRY	CA
26. INFORMANT'S NAME, RELATIONSHIP	WILLIAM CHEW CHOW, SON
27. INFORMANT'S MAILING ADDRESS	1662 1/2 CORTEZ ST, LOS ANGELES, CA 90026
28. NAME OF SURVIVING SPOUSE/DOMESTIC PARTNER - FIRST	SUSAN
29. MIDDLE	CHAN
30. LAST (BIRTH NAME)	CHAN
31. NAME OF FATHER/PARENT - FIRST	UNK
32. MIDDLE	-
33. LAST	CHOW
34. BIRTHPLACE	BURMA
35. NAME OF MOTHER/PARENT - FIRST	CHOI
36. MIDDLE	-
37. LAST (BIRTH NAME)	ME
38. BIRTHPLACE	BURMA
39. DISPOSITION DATE	12/12/2015
40. PLACE OF FINAL DISPOSITION	ROSE HILLS MEMORIAL PARK 3888 WORKMAN MILL ROAD, WHITTIER, CA 90601
41. METHOD OF DISPOSITION	BU
42. SIGNATURE OF EMBALMER	CASSANDRA ROSE VOIGHT
43. LICENSE NUMBER	EMB8407
44. NAME OF FINAL ESTABLISHMENT	ROSE HILLS ALHAMBRA
45. LICENSE NUMBER	FD17
46. SIGNATURE OF LOCAL REGISTRAR	JEFFREY GUNZENHAUSER, MD
47. DATE	12/08/2015
100. PLACE OF DEATH	SAINT VINCENT MEDICAL CENTER
100. FACILITY ADDRESS	2131 W 3RD ST
100. CITY	LOS ANGELES
101. CAUSE OF DEATH (a)	CARDIOGENIC SHOCK
(b)	ACUTE MYOCARDIAL INFARCTION
(c)	
(d)	
102. OTHER SIGNIFICANT CONDITIONS	NONE
103. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 101?	NO
104. INTERVAL BETWEEN ONSET AND DEATH	HRS: DAYS
105. DEATH REPORTED TO CORONER	NO
106. AUTOPSY PERFORMED	NO
107. AUTOPSY FINDINGS USED	NO
108. PREGNANCY	NO
109. CERTIFIER	JAGDEEP SINGH TUNG M.D.
110. LICENSE NUMBER	A92233
111. DATE SIGNED	12/07/2015
112. DATE INJURY OCCURRED	10/31/2015
113. TIME	11/06/2016
114. TYPE AND ADDRESS OF FACILITY	2131 W 3RD ST, LOS ANGELES, CA 90057
115. NAME OF ATTENDING PHYSICIAN	JAGDEEP SINGH TUNG M.D.
116. MANNER OF DEATH	Pending
117. DID TOBACCO USE CONTRIBUTE TO DEATH	
118. AUTOPSY	
119. DATE CASE REFERRED	
120. CASE NUMBER	
121. PLACE OF INJURY	
122. DESCRIBE HOW INJURY OCCURRED	
123. LOCATION	
124. SIGNATURE OF CORONER / DEPUTY CORONER	
125. TYPE NAME AND TITLE OF CORONER	
STATE REGISTRAR	A B C D E
FAX AUTH.#	
CENSUS TRACT	

CAL O SANGDI

CERTIFIED COPY OF VITAL RECORD
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

This is a true certified copy of the record filed in the County of Los Angeles Department of Public Health if it bears the Registrar's signature in purple ink.

000757535

DATE ISSUED DEC - 1 2015

Health Officer and Registrar

This copy is not admissible in evidence of death unless it is issued in accordance with the provisions of the California Health and Safety Code.

Page 1 of 1

Henry Chow's Vital Signs Deteriorating as they knew

Download Full screen Show email

Result (70-110 mg/dl) : 58 mg/dL
Comment : dextrose 1 amp D50W given iv
Teresa Cannon, RN (05 Nov 15 2355)
Electronic Signature by: Teresa Cannon, RN 5 Nov 15 2355

Thu, 05Nov 2200 ICU Documentation-Bedside Numbers Status: complete
Thu, 05Nov 2200 ICU Documentation-Bedside Numbers
Heart Rate : 46 (bpm)
Resp : 28
O2 Sat : 86 %
Height : 168 cm (5'6", 66 in)
(06 Nov 15 0532)

Thu, 05Nov 2245 Physician Notification w/SBAR Status: complete
Thu, 05Nov 2245 Physician Notification w/SBAR
Situation: : Heart Rate 45 B/P no b/p showing on the monitor, pulse very weekly found with doppler to the femoral pulses.
Background: : IABP pulled yesterday and vital signs deteriorating through the day, now maxed out on levo, dopamine, and neosynephrine
Assessment: : pt is not responsive, cold and mottled throughout with no peripheral pulses.
Physician Contacted : Jagdeep S Tung, MD
Time : Fri, 6 Nov 2015 2245
Method : phoned physician
Outcome : successful
Orders Received : no orders but to continue to increase the the vasopressors if needed.
Patient Response: : pulse and b/p respond temporarily and go back down. pulses in the groin are very weak now.
Teresa Cannon, RN (06 Nov 15 0022)
Electronic Signature by: Teresa Cannon, RN 6 Nov 15 0022

APPENDIX H

When to call your doctor

EXHIBIT 5

Call your doctor right away if you have any of these signs of worsening heart failure: p. 11/12

- Sudden weight gain (more than 2 pounds in 1 day or 5 pounds in 1 week, or whatever weight gain you were told to report by your doctor)
- Trouble breathing not related to being active
- New or increased swelling of your legs or ankles
- Swelling or pain in your abdomen
- Breathing trouble at night (waking up short of breath, needing more pillows to breathe)
- Frequent coughing that doesn't go away
- Feeling much more tired than usual

When to seek emergency medical attention

Call 911 right away if you have:

- Severe shortness of breath, such that you can't catch your breath even while resting
- Severe shortness of breath
- Severe chest pain that does not resolve with rest or nitroglycerin
- Pink, foamy mucus with cough and shortness of breath
- A continuous rapid or irregular heartbeat
- Passing out or fainting
- Stroke symptoms such as sudden numbness or weakness on one side of your face, arm, or leg or sudden confusion, trouble speaking or vision changes

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Thu, 05Nov 1000 Ventilator Maintenance - Nursing          Status: complete
Thu, 05Nov 1000 Ventilator Maintenance - Nursing
Retaped?                : no
ET/Airway Position      : Oral - Center
Level                   : 23 cm
Vent Settings           : Mode: SIMV-VC TV: 500  mL Rate: 2  bpm
                                FIO2: 40  % Low PEEP: 5  cm Press
                                Supp: 10  cmH2O
Respiratory Rate        : 22 Descriptn: regular, unlabored
Breath Sounds           : rhonchi
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Chest Movement : symmetrical expansion
Sputum : brown moderate thick
LOC :

2-1/12

Ma A Leyba, RN (05 Nov 15 1902)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 1902

Thu, 05Nov 1005 Restraint Reassessment for Removal Status: complete
Thu, 05Nov 1005 Restraint Reassessment for Removal
Date/Time Removed : Thu, 5 Nov 2015 2002
Type : restraint
Location : both wrist restraints removed
CMS WNL : no abnormalities noted
Performance : continued use of restraints required

Ma A Leyba, RN (05 Nov 15 2002)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 2002

Thu, 05Nov 1100 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1100 Neuro/Circulation Checks
Ordered Location : Bilateral
Instructions : notify physician if any deterioration
Neuro/Circulation Check : Location: left side weaker than the right side Circulation: warm to touch Capillary Refill 1-2 seconds pulse 1+ weak, thready Sensation/Movement: left side weaker than the right side

Ma A Leyba, RN (05 Nov 15 2001)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 2001

Thu, 05Nov 1200 ICU - Patient Care Status: complete
Thu, 05Nov 1200 ICU - Patient Care
Date/Time : Thu, 5 Nov 2015 1959
Safety : monitor alarms on, call light within reach, bed in low position, bed brakes on, ID band on bedside table within reach, side rails up: 3 rails up, bed alarms on,
Nursing Measures : oral care done, endotracheal care done,
Position : turn patient: right, head of bed up at 30 degrees,

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Activity : bedrest, passive range of motion,
Documented by : Ma A Leyba, RN
Ma A Leyba, RN (05 Nov 15 2000)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 2000

Thu, 05Nov 1200 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1200 Neuro/Circulation Checks
Ordered Location : left side weaker than the right side
Instructions : notify physician if any deterioration
Neuro/Circulation Check : Location: left side weaker than the right side Circulation: cold to touch cyanotic mottled Capillary Refill >3 seconds dopplerfaintly audible by doppler radial femoral Sensation/Movement: weak movement sensation on deep touch
Ma A Leyba, RN (05 Nov 15 1959)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 1959

Thu, 05Nov 1300 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1300 Neuro/Circulation Checks
Ordered Location : Bilateral
Instructions : notify physician if any deterioration
Neuro/Circulation Check : Location: left side weaaker than the right side Circulation: cold to touch cyanotic mottled Capillary Refill >3 seconds dopplerfaintly audible by doppler Sensation/Movement: weak movement sensation on deep touch
Ma A Leyba, RN (05 Nov 15 1957)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 1957

Thu, 05Nov 1400 ICU - Patient Care Status: complete
Thu, 05Nov 1400 ICU - Patient Care
Date/Time : Thu, 5 Nov 2015 1955
Safety : monitor alarms on, call light within reach, bed in low position, bed brakes on, ID band on bedside table within reach, side rails

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up: 3 rails up, bed alarms on,
Nursing Measures : oral care done, endotracheal care done,
Position : turn patient: left, head of bed up at 30 degrees,
Activity : bedrest, passive range of motion,
Documented by : Ma A Leyba, RN
Ma A Leyba, RN (05 Nov 15 1956)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 1956

Thu, 05Nov 1400 Intake & Output ICU Status: complete
Thu, 05Nov 1400 Intake & Output ICU
Tube Feeding : Amt: 120 mL Str/Type: Jevity 1.2 Cal (Substitute for Fibersource HN)
IV/IVP/IVPB Total : 372.3 ml
Foley : Urinary Catheter Output: 120 mL Character: yellow clear
Ma A Leyba, RN (05 Nov 15 1434)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 1434

Thu, 05Nov 1400 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1400 Neuro/Circulation Checks
Ordered Location : Bilateral
Instructions : notify physician if any deterioration
Neuro/Circulation Check : Location: left side not moving, right side weak Circulation: cold to touch cyanotic mottled Capillary Refill >3 seconds dopplerfaintly audible by doppler Sensation/Movement: sensation on deep touch weak movement
Ma A Leyba, RN (05 Nov 15 1955)
Electronic Signature by: Ma A Leyba, RN 5 Nov 15 1955

Thu, 05Nov 1500 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1500 Neuro/Circulation Checks
Ordered Location : Bilateral
Instructions : notify physician if any deterioration
Neuro/Circulation Check : Location: left side not moving, right side very weak Circulation: cold to touch

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cyanotic mottled Capillary Refill >3
seconds dopplerfaintly audible by
doppler Sensation/Movement: sensation
on deep touch weak movement
Ma A Leyba, RN (05 Nov 15 1954)
Electronic Signature by: Ma A Leyba, RN
5 Nov 15 1954

Thu, 05Nov 1600 ICU - Patient Care
Thu, 05Nov 1600 ICU - Patient Care Status: complete
Date/Time : Thu, 5 Nov 2015 1952
Safety : monitor alarms on, call light within reach, bed in low position, bed brakes on, ID band on bedside table within reach, side rails up: 3 rails up, bed alarms on,
Nursing Measures : oral care done,
Position : turn patient: right, head of bed up at 30 degrees,
Activity : bedrest, passive range of motion,
Documented by : Ma A Leyba, RN
Ma A Leyba, RN (05 Nov 15 1953)
Electronic Signature by: Ma A Leyba, RN
5 Nov 15 1953

Thu, 05Nov 1600 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1600 Neuro/Circulation Checks
Ordered Location : Bilateral
Instructions : notify physician if any deterioration
Neuro/Circulation Check : Location: no movements of the left side , right side is very weak Circulation: cold to touch cyanotic mottled Capillary Refill >3 seconds dopplerfaintly audible by doppler Sensation/Movement: left side not moving, right side very weak
Ma A Leyba, RN (05 Nov 15 1952)
Electronic Signature by: Ma A Leyba, RN
5 Nov 15 1952

Thu, 05Nov 1700 Neuro/Circulation Checks Status: complete
Thu, 05Nov 1700 Neuro/Circulation Checks

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1662 1/2 Cortez St., Los Angeles, CA 90026

A true and correct copy of the foregoing document entitled (*specify*): Adversary Complaint for Wrongful Death, etc.

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 11/12/26, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On (*date*) 11/12/26, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Mr. Howard Grobstein
VHS Liquidating Trust(ee)
6300 Canoga Avenue, Suite 1500W
Woodland Hills, CA 91367

The Dentons - Mr. John Moe II + Ms. Tania Moyron + Mr. Samuel Maizel, Denton US LLP, 601 S. Figueroa St., Ste. 2500, Los Angeles CA 90017

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/12/26	Lindsey Chow	
Date	*Printed Name*	*Signature*

B1040 (FORM 1040) (12/24)

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)	**ADVERSARY PROCEEDING NUMBER** (Court Use Only)

PLAINTIFFS	**DEFENDANTS**
LINDSEY E. CHOW, PLAINTIFF IN PRO PER and WILLIAM C. CHOW, PLAINTIFF IN PRO PER	VERITY HEALTH SYSTEM OF CALIFORNIA, INC. ET AL.
ATTORNEYS (Firm Name, Address, and Telephone No.)	**ATTORNEYS** (If Known) THE DENTONS -- MR. SAMUEL MAIZEL & MS. TANIA MOYRON & MR. JOHN MOE II
PARTY (Check One Box Only) ☐ Debtor ☐ U.S. Trustee/Bankruptcy Admin ☐ Creditor ☐ Other ☐ Trustee	**PARTY** (Check One Box Only) ☐ Debtor ☐ U.S. Trustee/Bankruptcy Admin ☐ Creditor ☐ Other ☒ Trustee MR. HOWARD GROBSTEIN

CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED)

ADVERSARIAL COMPLAINT FOR WRONGFUL DEATH, ELDER ABUSE, FRAUD, SURVIVORSHIP, I.I.E.D., MEDICAL BATTERY, AND VIOLATION OF INFORMED CONSENT

NATURE OF SUIT

(Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)

FRBP 7001(a) – Recovery of Money/Property
- ☐ 11-Recovery of money/property - §542 turnover of property
- ☐ 12-Recovery of money/property - §547 preference
- ☐ 13-Recovery of money/property - §548 fraudulent transfer
- ☐ 14-Recovery of money/property - other

FRBP 7001(b) – Validity, Priority or Extent of Lien
- ☐ 21-Validity, priority or extent of lien or other interest in property

FRBP 7001(c) – Approval of Sale of Property
- ☐ 31-Approval of sale of property of estate and of a co-owner - §363(h)

FRBP 7001(d) – Objection/Revocation of Discharge
- ☐ 41-Objection / revocation of discharge - §727(c),(d),(e)

FRBP 7001(e) – Revocation of Confirmation
- ☐ 51-Revocation of confirmation

FRBP 7001(f) – Dischargeability
- ☐ 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims
- ☐ 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud
- ☒ 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny

(continued next column)

FRBP 7001(f) – Dischargeability (continued)
- ☐ 61-Dischargeability - §523(a)(5), domestic support
- ☒ 68-Dischargeability - §523(a)(6), willful and malicious injury
- ☐ 63-Dischargeability - §523(a)(8), student loan
- ☐ 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support)
- ☐ 65-Dischargeability - other

FRBP 7001(g) – Injunctive Relief
- ☐ 71-Injunctive relief – imposition of stay
- ☐ 72-Injunctive relief – other

FRBP 7001(h) Subordination of Claim or Interest
- ☐ 81-Subordination of claim or interest

FRBP 7001(i) Declaratory Judgment
- ☐ 91-Declaratory judgment

FRBP 7001(j) Determination of Removed Action
- ☐ 01-Determination of removed claim or cause

Other
- ☐ SS-SIPA Case – 15 U.S.C. §§78aaa *et.seq.*
- ☐ 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)

☒ Check if this case involves a substantive issue of state law	☐ Check if this is asserted to be a class action under FRCP 23
☒ Check if a jury trial is demanded in complaint	Demand $ TO BE DETERMINED AT TRIIAL
Other Relief Sought Punitive Damages	

B1040 (FORM 1040) (12/24)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR VERITY HEALTH SYSTEM OF CALIFORNIA, INC. et. al.	BANKRUPTCY CASE NO. 2:18-BK-20151-SB	
DISTRICT IN WHICH CASE IS PENDING CENTRAL DISTRICT COURT OF CALIFORNIA	DIVISION OFFICE Los Angeles	NAME OF JUDGE Hon. Sheri Bluebond
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF)		
DATE OCTOBER 12, 2026	PRINT NAME OF ATTORNEY (OR PLAINTIFF) LINDSEY E. CHOW, PLAINTIFF PRO SE WILLIAM C. CHOW, PLAINTIFF PRO SE	

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and **Defendants.** Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.