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10 *Attorneys for the Chapter 11 Debtors
and Debtors In Possession*

11 **UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

12 In re:
13 ASTRIA HEALTH, et al.,
14 Debtors and Debtors in
15 Possession.¹

Chapter 11
Lead Case No. 19-01189-11
Jointly Administered

16 **STIPULATION CONTINUING
DISCLOSURE STATEMENT
HEARING AND DEADLINE TO
17 FILE REPLIES TO OBJECTIONS**

18 ¹ The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11), Glacier
19 Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11), Oxbow Summit,
20 LLC (19-01195-11), SHC Holdco, LLC (19-01196-11), SHC Medical Center - Toppenish (19-
01190-11), SHC Medical Center - Yakima (19-01192-11), Sunnyside Community Hospital
21 Association (19-01191-11), Sunnyside Community Hospital Home Medical Supply, LLC (19-
01197-11), Sunnyside Home Health (19-01198-11), Sunnyside Professional Services, LLC (19-
01199-11), Yakima Home Care Holdings, LLC (19-01201-11), and Yakima HMA Home Health,
LLC (19-01200-11).

**STIPULATION CONTINUING
DISCLOSURE STATEMENT
HEARING**

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[RELATED TO DOCKET NOS. 1472, 1473]

CONTINUED HEARING:

**Date/Time: August 19, 2020/11:00 am
(Pacific)**

**Location: Telephonic or in person at:
U.S. Bankruptcy Court,
402 E. Yakima Avenue,
Second Floor Courtroom
Yakima, WA 98901**

**Telephone Conference: (877) 402-9757
Access Code: 7036041**

**STIPULATION CONTINUING
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HEARING**

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1 **STIPULATION**

2 This stipulation (the “Stipulation”) is entered into between Astria Health
3 (“Astria”), a Washington nonprofit corporation, along with the above-referenced
4 affiliated debtors (collectively, the “Debtors”), the debtors and debtors in possession
5 in the above-captioned chapter 11 bankruptcy cases (collectively, the “Chapter 11
6 Cases”), Lapis Advisers, L.P. (“Lapis”), UMB Bank, N.A. as trustee (“UMB Bank”),
7 and the United States Trustee (the “U.S. Trustee,” and together with the Debtors,
8 Lapis, and UMB Bank, the “Parties”).

9 **RECITALS**

10 1. On July 7, 2020, Lapis, UMB and the Debtors (the “Plan Proponents”)
11 filed the *Joint 11 Chapter Plan of Reorganization of Astria Health and its Debtor*
12 *Affiliates* [Docket No. 1471] (the “Plan”) as well as the *Disclosure Statement*
13 *Relating to the Joint Chapter 11 Plan of Reorganization of Astria Health and its*
14 *Debtor Affiliates* [Docket No. 1472] (the “Disclosure Statement”).

15 2. The Plan Proponents also filed a *Notice of Hearing and Joint Motion for*
16 *an Order Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting*
17 *Procedures; (III) Notice and Objection Procedures for Confirmation of Joint Plan of*
18 *Reorganization; and (IV) Granting Related Relief; Memorandum of Points and*
19 *Authorities in Support Thereof* [Docket No. 1473], setting a hearing to consider the
20 Disclosure Statement for August 13, 2020, at 11:00 a.m. (the “Disclosure Statement”).

21 **STIPULATION CONTINUING
DISCLOSURE STATEMENT
HEARING**

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1 Hearing”) and August 7, 2020 as the deadline to file relies to any objections to the
2 Disclosure Statement (the “Reply Deadline”).

3 3. The Plan Proponents only received two objections to the Disclosure
4 Statement: one filed by the Official Committee of Unsecured Creditors (the
5 “Committee”) [Docket No. 1624] and the other filed by the U.S. Trustee [Docket No.
6 1626].²

7 4. On July 28, 2020, the Committee also served certain requests for
8 production of documents on the Debtors, Lapis and UMB Bank which relate to the
9 filed Plan and Disclosure Statement (the “Discovery Requests”). The deadline to
10 respond to these Discovery Requests is August 18, 2020.

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14 ² TIAA Commercial Finance, Inc. filed the *Objection and Joinder of TIAA*
15 *Commercial Finance, Inc. with Respect to the Debtors' Joint Motion for an Order*
16 *Approving: (I) Proposed Disclosure Statement; (II) Solicitation and Voting*
17 *Procedures; (III) Notice and Objection Procedures for Confirmation of Joint Plan of*
18 *Reorganization; and (IV) Granting Related Relief* [Docket No. 1625], which merely
19 joined the objections of other creditors to the Disclosure Statement and reserved the
20 right to supplement those objections.

21 **STIPULATION CONTINUING
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1 *Presented by:*

2 **Astria Health, et al.**

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4 Samuel R. Maizel
5 Sam J. Alberts
6 DENTONS US LLP

7 AND

8 James L. Day
9 Thomas A. Buford
10 BUSH KORNFELD LLP
11 *Counsel to Debtors and Debtors In Possession*

12 **Lapis Advisers, L.P.**

13 By: /s/ Ryan T. Jareck
14 Michael Sirota
15 Ryan T. Jareck
16 COLE SCHOTZ P.C.
17 *Counsel to Lapis Advisers, L.P.*

18 **UMB Bank, N.A., as trustee and**
19 **Lapis Advisers, L.P., as agent**

20 By: /s/ William W. Kannel
21 William W. Kannel (pro hac vice)
Ian A. Hammel (pro hac vice)
Timothy J. McKeon (pro hac vice)
Mintz Levin Cohn Ferris Glovsky & Popeo, P.C.
Counsel for UMB Bank, N.A., as trustee
and Lapis Advisers, L.P., as agent

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1 **Office of the United States Trustee**

2 By: /s/ Gary W. Dyer

3 Gary W. Dyer
4 Assistant United States Trustee
5 United States Department of Justice
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