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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
Possession.¹

Chapter 11

Lead Case No. 19-01189-11

Jointly Administered

15 **SECOND STIPULATION
CONTINUING DISCLOSURE
16 STATEMENT HEARING AND
17 DEADLINE TO 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**

DENTONS US LLP BUSH KORNFELD LLP



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**[RELATED TO DOCKET NOS. 1472, 1473,
1652]**

CONTINUED HEARING:

**Date/Time: September 2, 2020/11:00 am
(Pacific) (subject to Court availability)**

**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
DISCLOSURE STATEMENT
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 the Official Committee of Unsecured Creditors (the “Committee”) and the United
8 States Trustee (the “U.S. Trustee,” and together with the Debtors, Lapis, UMB Bank,
9 and the Committee, the “Parties”).

10 **RECITALS**

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

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

21 **STIPULATION CONTINUING
DISCLOSURE STATEMENT
HEARING**

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1 Disclosure Statement for August 13, 2020, at 11:00 a.m. (the “Disclosure Statement
2 Hearing”) and August 7, 2020 as the deadline to file relies to any objections to the
3 Disclosure Statement (the “Reply Deadline”).

4 3. The Plan Proponents only received two objections to the Disclosure
5 Statement: one filed by the Committee [Docket No. 1624] and the other filed by the
6 U.S. Trustee [Docket No. 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”), which set August
10 18, 2020 as the deadline to respond to these Discovery Requests
11 (the “Discovery Reply Deadline”).

12
13
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
DISCLOSURE STATEMENT
HEARING**

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1 B. The Disclosure Statement Hearing is continued from August 19, 2020,
2 at 11:00 a.m. to September 2, 2020, at 11:00 a.m. or to the next available hearing date
3 on the Court's calendar.

4 C. The Discovery Reply Deadline is extended from August 25, 2020 to
5 September 8, 2020.

6
7 *Presented by:*

8 **Astria Health, et al.**

9 By: /s/ Samuel R. Maizel
10 Samuel R. Maizel
11 Sam J. Alberts
12 DENTONS US LLP

13 AND

14 James L. Day
15 Thomas A. Buford
16 BUSH KORNFELD LLP
17 *Counsel to Debtors and Debtors In Possession*

18 **Lapis Advisers, L.P.**

19 By: /s/ Ryan T. Jareck
20 Michael Sirota
21 Ryan T. Jareck
22 COLE SCHOTZ P.C.
23 *Counsel to Lapis Advisers, L.P.*

24 **STIPULATION CONTINUING
DISCLOSURE STATEMENT
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1 **UMB Bank, N.A., as trustee and**
2 **Lapis Advisers, L.P., as agent**

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

10 **The Official Committee of Unsecured Creditors**

11 By: /s/ Andrew Sherman
12 Andrew Sherman (pro hac vice)
13 Boris Mankovetskiy (pro hac vice)
14 Sills Cummis & Gross, P.C.
15 *Counsel for the Official*
16 *Committee of Unsecured Creditors*

17 **Office of the United States Trustee**

18 By: /s/ Gary W. Dyer
19 Gary W. Dyer
20 Assistant United States Trustee
21 United States Department of Justice

**STIPULATION CONTINUING
DISCLOSURE STATEMENT
HEARING**

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