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Attorneys for Moving Party
DEXT CAPITAL, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re: CASE No. 2:23-bk-12359-SK

BEVERLY COMMUNITY HOSPITAL
ASSOCIATION DBA BEVERLY HOSPITAL,

Chapter 11 Case

Debtor.

REQUEST TO CONTINUE
HEARING ON MOTION FOR
RELIEF FROM STAY

- ☐ Affects all Debtors
☒ Affects Beverly Community
Hospital Association
☐ Montebello Community Health
Services, Inc.
☐ Beverly Hospital Foundation

Date: November 22, 2023
Time: 08:30 a.m.
Ctrm.: 1575

TO THE COURT, THE TRUSTEE AND ALL INTERESTED PARTIES:

Moving Party DEXT CAPITAL, LLC hereby requests that the
Hearing on the Motion for Relief from the Automatic Stay Under
U.S.C. § 362 set for November 22, 2023 at 8:30 a.m. in Courtroom
1575 be continued to December 6, 2023 at 8:30 a.m. in Courtroom
1575.

Moving Party's request is based on the fact that DEXT CAPITAL,



1 LLC has been in negotiations with WHITE MEMORIAL MEDICAL CENTER
2 D/B/A ADVENTIST HEALTH WHITE MEMORIAL to resolve Moving Party's
3 Motion for Relief from Stay.

4
5 Dated: November 17, 2023 FERNs, ADAMS & ASSOCIATES
6 A Professional Corporation

7
8 /s/ Amanda N. Ferns
9 AMANDA N. FERNs
10 Attorneys for Moving Party
11 DEXT CAPITAL, LLC
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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:
2815 Mitchell Drive, Suite 210, Walnut Creek, CA 94598

A true and correct copy of the foregoing document entitled (*specify*): REQUEST TO CONTINUE HEARING ON
MOTION FOR RELIEF FROM STAY

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*) 11/17/2023, 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*) 11/17/2023, 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.

☒ 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.

11/17/2023 Amanda N. Ferns
Date *Printed Name*

/s/ Amanda N. Ferns
Signature

ATTACHMENT TO PROOF OF SERVICE

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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Manual Notice List

2. **SERVED BY UNITED STATES MAIL:**

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Honorable Sandra Klein
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Roybal Federal Building
255 E. Temple Street
Los Angeles, CA 90012