

AMANDA N. FERNS, Bar No. 233104
FERNS, ADAMS & ASSOCIATES
a Professional Corporation
2815 Mitchell Drive, Suite 210
Walnut Creek, CA 94598
(925) 927-3401
aferns@fernslaw.com

Attorneys for Moving Party
DEXT CAPITAL, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re:
BEVERLY COMMUNITY HOSPITAL
ASSOCIATION DBA BEVERLY HOSPITAL,
Debtor.

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

Chapter 11 Case

JOINTLY ADMINISTERED WITH:
CASE NO. 2:23-BK-12360-SK
CASE NO. 2:23-BK-12361-SK

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

REQUEST TO CONTINUE THE
DECEMBER 6, 2023 HEARING
ON MOTION FOR RELIEF
FROM STAY

Date: December 6, 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 DEXT CAPITAL LLC'S Motion for Relief from the
Automatic Stay Under U.S.C. § 362 set for December 6, 2023 at
8:30 a.m. in Courtroom 1575 be continued to January 10, 2024 at



8:30 a.m. in Courtroom 1575.

Moving Party's request is based on the fact that DEXT CAPITAL, LLC continues to negotiate with WHITE MEMORIAL MEDICAL CENTER D/B/A ADVENTIST HEALTH WHITE MEMORIAL to resolve Moving Party's Motion for Relief from Stay and that there may be a settlement reached shortly.

Dated: December 5, 2023

FERNS, ADAMS & ASSOCIATES
A Professional Corporation

/s/ Amanda N. Ferns
AMANDA N. FERNS
Attorneys for Moving Party
DEXT CAPITAL, LLC

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 THE DECEMBER 6,
2023 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*) 12/05/2023, 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*) 12/05/2023, 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.

12/05/2023 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):

Megan M Adeyemo madeyemo@grsm.com, asoto@grsm.com

David E Ahdoot dahdoot@bushgottlieb.com, kprestegard@bushgottlieb.com

Joseph M Ammar ammar@millercanfield.com

Scott E Blakeley seb@blakeleyllp.com, ecf@blakeleyllp.com

Joseph P Buchman jbuchman@bwsllaw.com, gmittchell@bwsllaw.com

Adrian Butler abutler@bushgottlieb.com

Augustus Curtis augustus.t.curtis@usdoj.gov

Howard M Ehrenberg (TR) ehrenbergtrustee@gmlaw.com,
ca25@ecfcbis.com;C123@ecfcbis.com;howard.ehrenberg@ecf.courtdrive.com;Karen.Files@gmlaw.com

David K Eldan David.Eldan@doj.ca.gov

Amanda N Ferns aferns@fernsllaw.com, mmakalintal@fernsllaw.com

Alan W Forsley alan.forsley@flpllp.com, awf@fkllawfirm.com,awf@fl-lawyers.net,addy@flpllp.com

John-Patrick M Fritz jpf@lnbyg.com, JPF.LNBYB@ecf.inforuptcy.com

Evelina Gentry evelina.gentry@akerman.com, rob.diwa@akerman.com

Evan Gershbein ECFpleadings@kccllc.com

Faisal Gill fgill@glawoffice.com

Steven T Gubner sgubner@bg.law, ecf@bg.law

Melissa Hamill melissa.hamill@doj.ca.gov

Hallie Dale Hannah hallie@hannahllaw.com

Brian T Harvey bharvey@buchalter.com, IFS_filing@buchalter.com;dbodkin@buchalter.com

Stella A Havkin stella@havkinandshrago.com, shavkinesq@gmail.com

Robert M Hirsh rhirsh@lowenstein.com

Mark S Horoupian mark.horoupian@gmlaw.com,
mhoroupian@ecf.courtdrive.com;cheryl.caldwell@gmlaw.com;karen.files@gmlaw.com

Darryl Jay Horowitz dhorowitz@ch-law.com, bkasst@ch-law.com

David I Horowitz david.horowitz@kirkland.com,
keith.catuara@kirkland.com;terry.ellis@kirkland.com;elsa.banuelos@kirkland.com;ivon.granados@kirkland.com

Sonja Hourany sonja.hourany@quinngroup.net,
kadele@wgllp.com;lbracken@wgllp.com;shourany@ecf.courtdrive.com

Eric P Israel eisrael@danninggill.com, danninggill@gmail.com;eisrael@ecf.inforuptcy.com

Quinn Scott Kaye kaye@millercanfield.com

Nicholas A Koffroth nkoffroth@foxrothschild.com, khoang@foxrothschild.com

David S Kupetz David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com

Alexandria Lattner alattner@sheppardmullin.com, ehwalters@sheppardmullin.com

Daniel A Lev daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com;dlev@ecf.courtdrive.com

Marc A Levinson MALevinson@orrick.com, borozco@orrick.com,casestream@ecf.courtdrive.com

Ron Maroko ron.maroko@usdoj.gov

David M Medby dmedby@lawgarcia.com, jmobley@lawgarcia.com

Joshua M Mester jmester@jonesday.com

Elissa Miller elissa.miller@gmlaw.com, emillersk@ecf.courtdrive.com;cheryl.caldwell@gmlaw.com

Kenneth Miskin Kenneth.M.Miskin@usdoj.gov

Kelly L Morrison kelly.l.morrison@usdoj.gov

Tania M Moyron tania.moyron@dentons.com,
rebecca.wicks@dentons.com;kathryn.howard@dentons.com;derry.kalve@dentons.com;glenda.spratt@dentons.
com;DOCKET.GENERAL.LIT.LOS@dentons.com

Alan I Nahmias anahmias@mbn.law, jdale@mbn.law

Jennifer L Nassiri JNassiri@sheppardmullin.com

Neli Nima Palma neli.palma@doj.ca.gov

Valerie Bantner Peo vbantnerpeo@buchalter.com

Thomas Phinney tphinney@ffwplaw.com, akieser@ffwplaw.com;docket@ffwplaw.com

Thomas J Polis tom@polis-law.com, paralegal@polis-law.com;r59042@notify.bestcase.com

Christopher E Prince cprince@lesnickprince.com,
jmack@lesnickprince.com;cprince@ecf.courtdrive.com;jnavarro@lesnickprince.com

Dean G Rallis drallis@hahnlawyers.com,
jevans@hahnlawyers.com;drallis@ecf.courtdrive.com;jevans@ecf.courtdrive.com

William M Rathbone wrathbone@grsm.com, sdurazo@grsm.com

Michael B Reynolds mreynolds@swlaw.com, kcollins@swlaw.com

Russell W Reynolds rreynolds@ch-law.com, bkasst@ch-law.com

Jason E Rios jrios@ffwplaw.com, docket@ffwplaw.com

Mary H Rose mrose@buchalter.com, marias@buchalter.com;docket@buchalter.com

Kenneth N Russak krussak@knrlaw.com, krussak@russaklaw.com

Nathan A Schultz nschultzesq@gmail.com

Olivia Scott olivia.scott3@bclplaw.com

Zev Shechtman zs@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com

Howard Steinberg steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com

Andrew Still astill@swlaw.com, kcollins@swlaw.com

Tamar Terzian tterzian@hansonbridgett.com, ssingh@hansonbridgett.com

Jacob Unger junger@jacobungerlaw.com

United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

Mark J Valencia mvalencia@vclitigation.com

Emilio Eugene Varanini emilio.varanini@doj.ca.gov

Kevin Walsh kevin.walsh@gtlaw.com, kevin-walsh-3952@ecf.pacerpro.com

Kenneth K Wang kenneth.wang@doj.ca.gov, Richard.Waldow@doj.ca.gov

Sharon Z. Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.com

Roye Zur rzur@elkinskalt.com,
cavila@elkinskalt.com;lwageman@elkinskalt.com;1648609420@filings.docketbird.com

2. SERVED BY UNITED STATES MAIL:

Beverly Community Hospital Association dba Beverly Hospital
309 West Beverly Blvd
Montebello, CA 90640

Honorable Sandra Klein
Judge's Copy
U.S. Bankruptcy Court
Roybal Federal Building
255 E. Temple Street
Los Angeles, CA 90012