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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:) **Case No. 2:23-bk-12359-SK**

Beverly Community Hospital) **CHAPTER 11**

Association dba Beverly Hospital, a) **Jointly administered with:**

nonprofit public benefit corporation,¹)

Debtor.)

Case No. 2:23-bk-12360-SK
Case No. 2:23-bk-12361-SK

☐ **Affects all Debtors**

☒ **Affects Beverly Community
Hospital Association**

MOVANT ELOY SANCHEZ, ET AL'S
NOTICE OF STATUS TO COURT RE
STAY RELIEF MOTION RE: ACTION IN
NON-BANKRUPTCY (ECF NO. 871)

☐ **Affects Montebello Community
Hospital**

☐ **Affects Beverly Hospital
Foundation**

[No Hearing Required]

Motion for Relief from Stay Hearing:

Date: January 24, 2024

Time: 8:30 a.m.

Ctrm: 1575, Fifteenth Floor
U.S. Bankruptcy Court
255 E. Temple Street
Los Angeles, CA 90012

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Beverly Community Hospital Association d/b/a Beverly Hospital (6005), Montebello Community Health Services, Inc. (3550), and Beverly Hospital Foundation (9685). The mailing address for the Debtors is 309 W. Beverly Boulevard, Montebello, CA 90640.



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TO THE HONORABLE SANDRA R. KLEIN, UNITED STATES BANKRUPTCY
JUDGE; THE DEBTOR AND ITS COUNSEL OF RECORD; THE CHAPTER 11 TRUSTEE
AND HIS COUNSEL OF RECORD; THE OFFICE OF THE U.S. TRUSTEE; AND OTHER
PARTIES IN INTEREST:

Movants, Elroy Sanchez, et al submit the following *Status Report to the Court re: Movant's pending Stay Relief Motion* (ECF No. 871). Specifically, notwithstanding the filing of the Chapter 11 Trustee's *Opposition re Stay Relief*, counsel for both Movants and the Chapter 11 Trustee acknowledge the importance of allowing Movants (Plaintiffs in the Los Angeles County Superior Court) to proceed with their claim. Likewise, Movants acknowledge that the Chapter 11 Trustee and his counsel are getting a handle on the various medical malpractice/wrongful death claims, and the various insurance policies that will cover such claims. Consequently, Movants and the Chapter 11 Trustee, both through their counsel, have tentatively agreed to continue Movants' *Stay Relief Motion* for 45/60 days to allow the Chapter 11 Trustee to coordinate with the Debtor's various insurance companies and their defense counsel and then letting the various pending State Court Litigation matters to proceed in the forums where the matters were initiated.

Counsel for both the Chapter 11 Trustee and Movants will attend (via Zoom) the January 24, 2024 *Stay Relief Hearing* and inform the Court as to the agreed continued date regarding the *Stay Relief Motion*.

DATED: January 17, 2024

POLIS & ASSOCIATES, APLC

By: /s/ Thomas J. Polis
Thomas J. Polis, Esq.
Counsel for Movant, Eloy Sanchez,
individually and as successor-in-interest
for Eva Sanchez, Olga Bautista, Jose
Sanchez and Alvaro Sanchez

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: **POLIS & ASSOCIATES, 19800 MacArthur Boulevard, Suite 1000, Irvine, California 92612-2433**

A true and correct copy of the foregoing document described **MOVANT ELOY SANCHEZ, ET AL'S NOTICE OF STATUS TO COURT RE STAY RELIEF MOTION RE: ACTION IN NON-BANKRUPTCY (ECF NO. 871)** 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 indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 17, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

SEE ATTACHED

☒ Service information continued on attached page

2. SERVED BY U.S. MAIL:

On **January 17, 2024**, 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, 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.

Hon. Sandra Klein, US Bankruptcy Court, 255 E. Temple Street, Suite 1582, Los Angeles, CA 90012

☐ 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 , **2024**, 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 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 of America that the foregoing is true and correct.

January 17, 2024

Date

Cristina L. Allen

Type Name

/s/ Cristina L. Allen

Signature

CONTINUED PROOF OF SERVICE

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

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