

SAMUEL R. MAIZEL (SBN 189301)
samuel.maizel@dentons.com
TANIA M. MOYRON (SBN 235736)
tania.moyron@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Telephone: 213 623 9300
Facsimile: 213 623 9924

*Attorneys for the Post-Effective Date Debtors
and Special Counsel to the Liquidation Trustee*

**UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA -
LOS ANGELES DIVISION**

In re
VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,
Debtors and Debtors In Possession.

- ☒ Affects All Debtors
- ☐ Affects Verity Health System of California, Inc.
☐ Affects O'Connor Hospital
☐ Affects Saint Louise Regional Hospital
☐ Affects St. Francis Medical Center
☐ Affects St. Vincent Medical Center
☐ Affects Seton Medical Center
☐ Affects O'Connor Hospital Foundation
☐ Affects Saint Louise Regional Hospital
Foundation
☐ Affects St. Francis Medical Center of Lynwood
Foundation
☐ Affects St. Vincent Foundation
☐ Affects St. Vincent Dialysis Center, Inc.
☐ Affects Seton Medical Center Foundation
☐ Affects Verity Business Services
☐ Affects Verity Medical Foundation
☐ Affects Verity Holdings, LLC
☐ Affects De Paul Ventures, LLC
☐ Affects De Paul Ventures - San Jose ASC, LLC

Debtors and Debtors In Possession.

Lead Bankruptcy Case No. 2:18-bk-20151-BB
Jointly Administered with:
Case No. 2:18-bk-20162-BB
Case No. 2:18-bk-20163-BB
Case No. 2:18-bk-20164-BB
Case No. 2:18-bk-20165-BB
Case No. 2:18-bk-20167-BB
Case No. 2:18-bk-20168-BB
Case No. 2:18-bk-20169-BB
Case No. 2:18-bk-20171-BB
Case No. 2:18-bk-20172-BB
Case No. 2:18-bk-20173-BB
Case No. 2:18-bk-20175-BB
Case No. 2:18-bk-20176-BB
Case No. 2:18-bk-20178-BB
Case No. 2:18-bk-20179-BB
Case No. 2:18-bk-20180-BB
Case No. 2:18-bk-20181-BB

Chapter 11 Cases
Hon. Judge Sheri Bluebond

**STIPULATION CONTINUING HEARING
DATE AND EXTENDING REPLY
DEADLINE RE MOTION FOR
AUTHORITY TO USE RESTRICTED
FUNDS [DOCKET NOS. 6817]**

Hearing:

Date: October 1, 2025
Time: 10:00 a.m.
Place: Courtroom 1539
255 East Temple Street
Los Angeles, California 90012

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
213 623 9300



1 This Stipulation is entered between the Liquidation Trustee (the “Liquidation Trustee”) of
2 the VHS Liquidation Trust, established pursuant to the *Modified Second Amended Joint Chapter 11*
3 *Plan of Liquidation (Dated July 2, 2020) of the Debtors, the Prepetition Secured Creditors, and*
4 *the Committee* [Docket No. 5466], confirmed by the order [Docket No. 5504] entered August 14,
5 2020, and that certain Liquidation Trust Agreement, dated as of September 5, 2020 [Docket
6 No. 6043], on the one hand, and the California Attorney General, on the other, with respect to the
7 following:
8

9 1. On December 11, 2024, the Liquidation Trustee filed the *Motion for Authority to*
10 *Use Restricted Funds* [Docket No. 6817] (the “Motion to Use Restricted Funds”).

11 2. The Court set a hearing on the Motion to Use Restricted Funds for January 8, 2025,
12 at 1:00 p.m. (the “Hearing Date”). The deadline to respond to the Motion to Use Restricted Funds
13 was December 26, 2024 (the “Response Deadline”).
14

15 3. On December 20, 2024, the Court approved a stipulation [Docket No. 6828]
16 between the California Attorney General and the Liquidation Trustee, extending the Response
17 Deadline to January 15, 2025, and continuing the Hearing Date to January 29, 2025, at 2:00 p.m.

18 4. On January 13, 2025, the Court approved a stipulation [Docket No. 6835] between
19 the California Attorney General and the Liquidation Trustee, extending the Response Deadline to
20 January 22, 2025, and continuing the Hearing Date to February 5, 2025, at 10:00 a.m.

21 5. On January 21, 2025, the Court approved a stipulation [Docket No. 6840] between
22 the California Attorney General and the Liquidation Trustee, extending the Response Deadline to
23 January 29, 2025, and continuing the Hearing Date to February 12, 2025, at 1:00 p.m.

24 6. On January 29, 2025, the California Attorney General filed its opposition [Docket
25 No. 6844] (the “Opposition”) to the Motion to Use Restricted Funds. The deadline for the
26 Liquidation Trustee to file a reply in support of the Motion to Use Restricted Funds was February
27
28

1 5, 2025 (the “Reply Deadline”).

2 7. On February 5, 2025, the Court approved a stipulation [Docket No. 6848] between
3 the California Attorney General and the Liquidation Trustee, extending the Reply Deadline to
4 February 26, 2025, and continuing the Hearing Date to March 5, 2025, at 10:00 a.m.

5 8. On February 21, 2025, the Court approved a stipulation [Docket No. 6852] between
6 the California Attorney General and the Liquidation Trustee, extending the Reply Deadline to
7 March 19, 2025, and continuing the Hearing Date to March 26, 2025, at 10:00 a.m.

8 9. On March 18, 2025, the Court approved a stipulation [Docket No. 6854] between
9 the California Attorney General and the Liquidation Trustee, extending the Reply Deadline to June
10 18, 2025, and continuing the Hearing Date to June 25, 2025, at 10:00 a.m.

11 10. On May 21, 2025, the Court approved a stipulation [Docket No. 6860] between the
12 California Attorney General and the Liquidation Trustee, extending the Reply Deadline to July 18,
13 2025, and continuing the Hearing Date to July 30, 2025, at 10:00 a.m.

14 11. On July 16, 2025, the Court approved a stipulation [Docket No. 6866] between the
15 California Attorney General and the Liquidation Trustee, extending the Reply Deadline to August
16 13, 2025, and continuing the Hearing Date to August 20, 2025, at 10:00 a.m.

17 12. The California Attorney General and the Liquidation Trustee have agreed to a
18 further continuance of the Hearing Date and extension of the Reply Deadline to allow further
19 investigation and settlement discussions.

20 NOW THEREFORE all of the parties to this Stipulation hereby stipulate and agree as
21 follows:

22 A. The Hearing Date shall be continued from August 20, 2025, to October 1, 2025, at
23 10:00 a.m.

24 B. The Liquidation Trustee’s Reply Deadline shall be extended to September 24, 2025.

Liquidation Trustee

By /s/ Tania M. Moyron

Samuel R. Maizel

Tania M. Moyron

Dentons US LLP

*Counsel to the Post Effective Date Debtors
and Special Counsel to the Liquidation Trustee*

California Attorney General

By 

David K. Eldan

Deputy Attorney General

Charitable Trusts Section

Counsel to the Office of the Attorney General

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is Suite 2500, 601 South Figueroa Street, Los Angeles, California 90017-5704.

A true and correct copy of the document entitled (*specify*): STIPULATION CONTINUING HEARING DATE AND EXTENDING REPLY DEADLINE RE MOTION FOR AUTHORITY TO USE RESTRICTED FUNDS [DOCKET NOS. 6817] 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 Local Rules, the foregoing document will be served by the court via NEF and hyperlink to the document. On August 13, 2025, I checked the CM/ECF docket for this case and determined that the following person/s is/are on the Electronic Mail Notice List to receive NEF transmission, including.

Paul J. Laurin
Barnes & Thornburg LLP
2029 Century Park East Ste 300
Los Angeles, CA 90067-6018

Counsel for 3M Corp.
T: 310 284 3880 / F: 310 284 3894
E: plaurin@btlaw.com

Marshall J. Hogan
Michael B. Reynolds
Andrew Still
Snell & Wilmer LLP
600 Anton Boulevard, Suite 1400
Costa Mesa, CA 92626

Counsel for AHMC Healthcare, Inc., Blue Shield of CA
Promise Health Plan fka Care1st Health Plan, CA
Physicians' Service dba Blue Shield of CA,
T: 714 427 7000 / F: 714 427 7799
E: mhogan/mreynolds/astill@swlaw.com

Steven D. Jerome
Snell & Wilmer LLP
1 East Washington, Suite 2700
Phoenix, AZ 85004

Counsel for AHMC Healthcare, Inc.
T: 602 382 6000 / F: 602 382 6080
E: sjerome@swlaw.com

Melissa W. Jones
David E. Lemke
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, TN 37219

Counsel for Ally Bank
T: 615 244 6380 / F: 615 244 6804
E: david.lemke@wallerlaw.com

Rebecca J. Winthrop
Norton Rose Fulbright US LLP
555 South Flower Street, 41st Floor
Los Angeles, CA 90071

Counsel for AT&T Corp., AT&T Services, Inc. & affiliates
T: 213 892 9346 / F: 213 892 9494
E: rebecca.winthrop@nortonrosefulbright.com

Keith P. Banner
Brian L. Davidoff
Greenberg Glusker
1900 Avenue of the Stars, 21st Floor
Los Angeles, CA 90067

Counsel for Abbott Rapid Diagnostics Informatics, Inc. fka
Alere Informatics, Inc.
T: 310 553 3610 / F: 310 553 0687
E: kbanner/bdavidoff@greenbergglusker.com

Richard H. Golubow
Winthrop Golubow Hollander, LLP
1301 Dove Street, Suite 500
Newport Beach, CA 92660

Counsel for Anupam Aditi, Anil Jain, Catherine Wolferd
T: 949 720 4100 / F: 949 720 4111
E: rgolubow@wghlawyers.com

Payam Khodadadi
McGuireWoods LLP
1800 Century Park East, 8th Floor
Los Angeles, CA 90067

Counsel for Aetna Life Insurance Co., Aetna, Inc. & Its
Affiliated Entities
T: 310 396 3415 / F: 310 315 8241
E: pkhodadadi@mcguirewoods.com

Barry A. Chatz
Saul Ewing Arnstein & Lehr LLP
161 North Clark Street, Suite 4200
Chicago, IL 60601

Counsel for Alcon Vision, LLC, Bausch Health US, LLC
T: 312 876 6670 / F: 312 876 6241
E: barry.chatz@saul.com

Kevin H. Morse
Clark Hill PLC
130 East Randolph Street, Suite 3900
Chicago, IL 60601

Counsel for Alcon Vision, LLC, Shared Imaging, LLC
T: 312 985 5556 / F: 312 517 7593
E: kmorse@clarkhill.com

Mark D. Plevin
Crowell & Moring LLP
275 Battery Street, Suite 2300
San Francisco, CA 94111

Counsel for Alignment Health Plan, Medimpact Healthcare
Systems
T: 415 986 2800 / F: 415 986 2827
E: mplevin@plevinturner.com

Bryan L. Ngo
650 Town Center Drive, Suite 1530
Costa Mesa, CA 92626

Counsel for All Care Medical Group, Inc.
T: 714 839 3800 / F: 714 795 2995
E: bngo@fortislaw.com

Susan I. Montgomery
Law Office of Susan I. Montgomery
1100 Glendon Avenue, 15th Floor
Los Angeles, CA 90024

Counsel for All Care Medical Group, Inc., AppleCare
Medical Group, AppleCare Medical Group St. Francis,
Inc., AppleCare Medical Group, Inc., AppleCare Medical
Management, LLC
T: 310 556 8900 / F: 310 556 8905
E: susan@simontgomerylaw.com

Mark A. Neubauer
Carlton Fields, LLP
2029 Century Park East, Suite 1200
Los Angeles, CA 90067-2913

Counsel for Angeles IPA, St. Vincent IPA Medical Corp.
T: 310 843 6300 / F: 310 843 6301
E: mneubauer@carltonfields.com

Christopher M. Terrel
Talkov Law Corp.
2900 Adams Street, C225
Riverside, CA 92504

Counsel for Annapolis Consulting Group, Inc., TCI
Holdings, Inc.
T: 951 888 3300 / F: 949 260 0613
E: ckiernan@theryanfirm.com

Latonia Williams
Shipman & Goodwin LLP
One Constitution Plaza
Hartford, CT 06103

Counsel for AppleCare Medical Group, AppleCare Medical
Group, Inc., AppleCare Medical Management, LLC,
St. Francis Inc., UnitedHealthcare Insurance Co.
T: 860 251 5037 / F: 860 251 5218
E: lwilliams@goodwin.com

Matthew A. Gold
Argo Partners
12 West 37th Street, 9th Floor
New York, NY 10018

Counsel for Argo Partners
T: 213 643 5445 / F: 212 643 6401
E: courts@argopartners.net

David K. Eldan
Hutchison B. Meltzer
Kenneth K Wang
State of California Dept. of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013

Counsel for Attorney General for the State of California,
California Dep't of Health Care Services
T: 213 269 6041 / F: 916 731 2145
E: david.eldan/hutchison.meltzer/Kenneth.wang
@doj.ca.gov

Kerry L Duffy
Bartko Zankel Bunzel & Miller
One Embarcadero Center, Suite 800
San Francisco, CA 94111

Special Counsel
T: 415 956 1900 / F: 415 956 1152
E: kduffy@bartkolaw.com

Lee F. Hoffman
Law Office of B.J. Fadem & Associates
111 West Saint John Street, Suite 700
San Jose, CA 95113

Counsel for Anthony Barajas, Sydney Thomson
T: 408 280 1220 / F: 408 971 9940
E: leehoffmanjd@gmail.com

Julie H. Rome-Banks
Binder Malter Harris & Rome-Banks LLP
2775 Park Avenue
Santa Clara, CA 95050

Counsel for Bay Area Surgical Management, LLC
T: 408 295 1700
E: julie@bindermalter.com

David B. Shemano
1801 Century Park East, Suite 2500
Los Angeles, CA 90067

Counsel for Bayer Healthcare LLC, Jarmaine Johns, Iris
Lara, Tanya Llera, Ernesto Madrigal, Waheed Wahidi
T: 310 492 5033
E: dshemano@shemanolaw.com

Christopher A. Minier
Ringstad & Sanders LLP
3070 Bristol Street, Suite 640
Costa Mesa, CA 92626

Counsel for Belfor USA Group, Inc.
T: 949 851 7450
E: cminier@go2.law

Gregory A. Rougeau
Brunetti Rougeau LLP
400 Montgomery Street, Suite 1000
San Francisco, CA 94104

Counsel for Bio-Medical Applications of California, Inc.,
Diem Anh Cao, Gregory Armand Spectra Laboratories
T: 415 291 8425 / F: 415 291 8426
E: grougeau@brlawsf.com

Kevin M. Eckhardt
16474 Sunset Boulevard
Pacific Palisades, CA 90272

Counsel for C.R. Bard, Inc., Eurofins VRL, Inc., Smith &
Nephew, Inc.
T: 704 819 0976 / F: 213 532 2020
E: kevin.eckhardt@gmail.com

Robert A. Rich
Hunton Andrews Kurth LLP
200 Park Avenue
New York, NY 10166

Counsel for C.R. Bard, Inc., Eurofins VRL, Inc., Smith &
Nephew, Inc.
T: 213 532 2000
E: rrich2@huntonak.com

Eric J. Fromme
Scott Schoeffel
Adam G. Wentland
Theodora Oringer PC
535 Anton Boulevard, 9th Floor
Costa Mesa, CA 92626-7109

Counsel for CHHP Holdings II, LLC, CPH Hospital
Management, LLC, Eladh, L.P., Gardena Hospital L.P.
T: 714 549 6200 / F: 714 549 6201
E: efromme/awentland@tocounsel.com

Allison R. Axenrod
Claims Recovery Group LLC
92 Union Avenue
Cresskill, NJ 07626

Counsel for CRG Financial LLC
T: 201 266 6988 / F: 201 266 6985
E: allison@claimsrecoveryllc.com

Joan Huh
CA Department of Tax and Fee Admin.
450 N Street, MIC:82
Sacramento, CA 95814

Counsel for California Dep't of Tax & Fee Administration
T: 916 323 3250 / F: 916 323 3387
E: joan.huh@cdtfa.ca.gov

Jacob Beiswenger
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90019

Counsel for California Governor's Office of Emergency
Services
T: 213 430 6000 / F: 213 430 6407
E: jbeiswenger@omm.com

Kyrsten Skogstad
California Nurses Ass'n Legal Dep't
155 Grand Avenue
Oakland, CA 94612

Counsel for California Nurses Ass'n
T: 510 273 2200 / F: 510 663 4822
E: kskogstad@calnurses.org

Stephen D. Lee
Richards, Watson & Gershon
350 South Grand Avenue, Suite 3700
Los Angeles, CA 90071

Counsel for California Statewide Communities
Development Authority
T: 213 626 8484 / F: 213 626 0078
E: slee@rwglaw.com

Debra Riley
Allen Matkins Leck Gamble Mallory & Natsis
600 West Broadway, 27th Floor
San Diego, CA 92101-0903

Counsel for California Statewide Communities
Development Authority
T: 619 235 1520 / F: 619 233 1158
E: driley@allenmatkins.com

Daniel Varon
The Zalkin Law Firm, PC
10590 W Ocean Air Drive, Suite 125
San Diego, CA 92130

Counsel for Cindy Campbell
T: 858 259 3011
E: daniel@zalkin.com

Andy J. Epstein
20211 Spectrum
Irvine, CA 92618

Counsel for Renee Elizabeth Capizzi, Rosa Carcamo,
Ivonne Engelman
T: 619 846 7369 / F: 866 212 7227
E: taxcpaesq@gmail.com

Matthew J. Olson
Dorsey & Whitney LLP
167 Hamilton Avenue, Suite 200
Palo Alto, CA 94301

Counsel for Care Ambulance Service, Inc.
T: 650 843 2744 / F: 650 618 1913
E: olson.matt@dorsey.com

Elan S. Levey
Federal Building, Suite 7516
300 North Los Angeles Street
Los Angeles, CA 90012

Counsel for Centers for Medicare & Medicaid Services,
Federal Communications Commission, Pension Benefit
Guaranty Corp., U.S. Dep't of Health & Human Services,
United States of America
T: 213 894 3997 / F: 213 894 7819
E: elan.levey@usdoj.gov

Leslie A. Berkoff
Moritt Hock & Hamroff LLP
400 Garden City Plaza
Garden City, NY 11530

Counsel for Centinel Spine LLC
T: 516 873 2000 / F: 516 873 2010
E: lberkoff@moritthock.com

Lawrence J. Hilton
One LLP
4000 MacArthur Boulevard, East Tower, Suite 500
Newport Beach, CA 92660

Counsel for Cerner Corp., Maxim Healthcare Services, Inc.
T: 949 502 2876 / F: 949 258 5081
E: lhilton@onellp.com

J. Scott Bovitz
Bovitz & Spitzer
1100 Wilshire Boulevard, Suite 2403
Los Angeles, CA 90017-1961

Counsel for Children's Hospital Los Angeles
T: 213 346 8300 / F: 213 928 4174
E: bovitz@bovitz-spitzer.com

Marcus Colabianchi
Duane Morris LLP
One Market Plaza, Spear Street Tower, Suite 2200
San Francisco, CA 94105-1127

Counsel for Chubb Companies
T: 415 957 3000 / F: 415 591 1400
E: mcolabianchi@duanemorris.com

Jeffrey C. Wisler
Connolly Gallagher LLP
1000 West Street, Suite 1400
Wilmington, DE 19801

Counsel for Cigna Healthcare of California, Inc., Llife
Insurance Co. of North America
T: 302 888 6258
E: jwisler@connollygallagher.com

Richard J. Reynolds
Burke Williams & Sorensen LLP
1851 East 1st Street, Suite 1550
Santa Ana, CA 92705

Counsel for City of Daly City
T: 949 863 3363 / F: 949 863 3350
E: jwisler@connollygallagher.com

Rose Zimmerman
City of Daly City, City Attorney
333 90th Street
Daly City, CA 94015

Counsel for City of Daly City
T: 650 991 8122 / F: 650 991 5759
E: rzimmerman@dalcity.org

David I. Horowitz
David A. Klein
Kirkland & Ellis LLP
333 South Hope Street
Los Angeles, CA 90071

Counsel for Conifer Health Solutions, LLC
T: 213 680 8400 / F: 213 680 8500
E: david.horowitz/david.klein@kirkland.com

Peter J. Benvenuti
Jane Kim
Keller Benvenuti Kim LLP
425 Market Street, 26th Floor
San Francisco, CA 94105

Counsel for County of San Mateo
T: 415 496 6723 / F: 510 834 2410
E: pbenvenuti/jkim@kellerbenvenuti.com

Chane Buck
Jones Day
555 South Flower Street, 50th Floor
Los Angeles, CA 90071

Courtesy NEF
T: 213 243 2649 / F: 213 243 2539
E: Chane.b46@gmail.com

Michael G. Fletcher
Frandzel Robins Bloom & Csato LC
1000 Wilshire Boulevard, 19th Floor
Los Angeles, CA 90017-2427

Courtesy NEF
T: 323 852 1000 / F: 323 651 2577
E: mfletcher@frandzel.com

Matthew B. Holbrook
Sheppard Mullin Richter & Hampton
650 Town Center Drive, 10th Floor
Costa Mesa, CA 92626

Courtesy NEF
T: 714 513 5100 / F: 714 513 5130
E: mholbrook@sheppardmullin.com

William E. Ireland
Haight Brown & Bonesteel
555 South Flower Street, 45th Floor
Los Angeles, CA 90071

Courtesy NEF
T: 213 542 8000 / F: 213 542 8100
E: wireland@hbblaw.com

Meredith King
Higgs Fletcher & Mack
401 West A Street, Suite 2600
San Diego, CA 92101

Courtesy NEF
T: 619 236 1551 / F: 619 696 1410
E: mking@fsl.law

David S. Kupetz
Locke Lord LLP
300 South Grand Avenue, Suite 2600
Los Angeles, CA 90071

Courtesy NEF
T: 213 687 6744 / F: 213 341 6744
E: david.kupetz@lockelord.com

Mary H. Rose
Buchalter PC
1000 Wilshire Boulevard, Suite 1500
Los Angeles, CA 90017

Courtesy NEF
T: 213 891 5727 / F: 213 896 0400
E: mrose@buchalter.com

Gary F. Torrell
Hooper, Lundy & Bookman, P.C.
1875 Century Park East, Suite 1600
Los Angeles, CA 90067

Courtesy NEF
T: 310 551 8103 / F: 310 551 8181
E: gtorrell@hooperlundy.com

Jason Wallach
Gipson Hoffman & Pancione
1901 Avenue of the Stars, 11th Floor
Los Angeles, CA 90067

Courtesy NEF
T: 310 556 4660 / F: 310 556 8945
E: jwallach@ghplaw.com

Kirsten A Worley
Higgs Fletcher & Mack
401 West A Street, Suite 2600
San Diego, CA 92101-7913

Courtesy NEF
T: 619 236 1551 / F: 619 696 1410
E: worleyk@higgslaw.com

Claire K. Wu
Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa Street, 36th Floor
Los Angeles, CA 90017

Courtesy NEF
T: 213 488 7100 / F: 213 629 1033
E: claire.wu@pillsburylaw.com

Michael S. Winsten
Winsten Law Group
28 Calle Castillo
San Clemente, CA 92673

Counsel for DaVita Inc.
T: 949 418 1083 / F: 949 429 3500
E: mike@winsten.com

Phillip K. Wang
Rimon Law, P.C.
423 Washington Street, Suite 600
San Francisco, CA 94111

Counsel for Delta Dental of California
T: 415 968 2002
E: pwang@strategylaw.com

Louis J. Cisz, III
Nixon Peabody LLP
One Embarcadero Center, 32nd Floor
San Francisco, CA 94111

Counsel for El Camino Hospital, El Camino Medical
Associates, P.C.
T: 415 984 8320 / F: 415 984 8300
E: lcisz@nixonpeabody.com

Gerald P. Kennedy
Procopio
525 B Street, Suite 2200
San Diego, CA 92101

Counsel for Emerald Textiles, Emerald Textiles, LLC
T: 619 238 1900 / F: 619 515 3202
E: gerald.kennedy@procopio.com

Shawn C. Groff
Mollie Simons
Andrew J. Ziaja
Leonard Carder, LLP
1999 Harrison Street, Suite 2700
Oakland, CA 94612

Counsel for Engineers & Scientists of CA Local 20, IFPTE
T: 510 272 0169 / F: 510 272 0174
E: aziaja/msimons/sgroff@leonardcarder.com

Joseph D. Frank
325 North LaSalle Street, Suite 625
Chicago, IL 60654

Counsel for Experian Health fka Passport Health
Communications Inc., Experian Health, Inc.
T: 312 276 1400 / F: 312 276 0035
E: jfrank@fgllp.com

Alan I. Nahmias
Mirman & Bubman & Nahmias LLP
21860 Burbank Boulevard, Suite 360
Woodland Hills, CA 91367

Counsel for Experian Health fka Passport Health
Communications Inc., Experian Health, Inc.
T: 818 995 2555 / F: 818 451 4620
E: anahmias@mbn.law

James C. Behrens
Alexandra Achamallah
Daniel Denny
Milbank LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067

Counsel for FTI Consulting, Inc., Howard Grobstein
Liquidating Trustee, Official Committee of Unsecured
Creditors
T: 424 386 4000 / F: 213 892 4736
E: jbehrens/aachamallah/ddenny@milbank.com

John Mark Jennings
Lisa M. Peters
Kutak Rock LLP
5 Park Plaza, Suite 1500
Irvine, CA 92614

Counsel for GE HFS, LLC
T: 949 417 0999 / F: 949 417 5394
E: johnmark.jennings/lisa.peters@kutakrock.com

Keith C. Owens
Michael A. Sweet
Joseph Shickich
Robert N. Amkraut
Trey A. Monsour
Fox Rothschild LLP
10250 Constellation Boulevard, Suite 900
Los Angeles, CA 90067

Counsel for GRM Information Management Services Inc.,
Messiahic Inc. d/b/a PayJunction, Microsoft Corp.,
Swinerton Builders, nThrive Solutions, Inc. fka Medassets
T: 310 598 4150
E: kowens/msweet/jshickich/ramkraut/tmonsour
@foxrothschild.com

Sheila Gropper Nelson
456 Montgomery Street, Suite 1300
San Francisco, CA 94104

Counsel for Golden GatePerfusion Inc.
T: 415 362 2221
E: shedoesbklaw@aol.com

Richard H. Golubow
Winthrop Golubow Hollander, LLP
1301 Dove Street, Suite 500
Newport Beach, CA 92660

Counsel for Roseann Gonzalez
T: 949 720 4100 / F: 949 720 4111
E: rgolubow@wghlawyers.com

Gary D. Underdahl
ASK LLP
2600 Egan Woods Drive, Suite 400
Eagan, MN 55121

Counsel for Howard Grobstein, Trustee, Verity Health
System of California, Inc.
T: 651 406 9665 / F: 651 406 9676
E: rgolubow@wghlawyers.com

Barbara R. Gross
Barbara R. Gross, Attorney at Law
420 Spruce Street, Suite B
San Diego, CA 92103

Counsel for Barbara R. Gross
T: 619 782 9233
E: barbara@bgross.law

Cristina E. Bautista
William B. Freeman
Katten Muchin Rosenman LLP
515 South Flower Street, Suite 1000
Los Angeles, CA 90071-2212

Counsel for Health Net of California, Inc.
T: 213 788 7450 / F: 213 788 7380
E: cristina.bautista/bill.freeman@kattenlaw.com

Levi Reuben Uku
Law Offices of Levi Reuben Uku
1055 West 7th Street, Suite 3300
Los Angeles, CA 90017

Counsel for Sophia Holly-Horton
T: 213 385 0193 / F: 213 385 0576
E: levireuben@gmail.com

Craig G. Margulies
Monserrat Morales
Margulies Faith LLP
16030 Ventura Boulevard, Suite 470
Encino, CA 91436

Counsel for Hooper Healthcare Consulting LLC
T: 818 705 2777 / F: 818 705 3777
E: craig/monsi@marguliesfaithlaw.com

Gregory Kaden
Douglas B. Rosner
Goulston & Storrs PC
400 Atlantic Avenue
Boston, MA 02110

Counsel for Humana Inc. and its affiliates
T: 617 482 1776 / F: 617 574 4112
E: drosner@goulstonstorrs.com

Michael D. Breslauer
401 B Street, Suite 1200
San Diego, CA 92101

Counsel for Hunt Spine Institute, Inc.
T: 619 238 4804
E: mbreslauer@swsslaw.com

Megan A. Rowe
Daponte Simpson Rowe PC
500 Capitol Mall, Suite 2260
Sacramento, CA 95814

Interested Party
T: 916 840 5607 / F: 916 840 2299
E: mrowe@dsrhealthlaw.com

Craig N. Haring
Christopher J. Petersen
Blank Rome LLP
2029 Century Park East, 6th Floor
Los Angeles, CA 90067

Counsel for Infor (US), Inc.
T: 424 239 3481 / F: 424 239 3434
E: charing/chris.petersen@blankrome.com

Mariam Danielyan
Law Office of Mariam Danielyan
100 North Brand Boulevard, Suite 3
Glendale, CA 91203

Counsel for Aida Iniguez, Francisco Iniguez
T: 818 291 6470 / F: 818 291 6205
E: md@danielyanlawoffice.com

Anna Kordas
Jones Day
250 Vesey Street
New York, NY 10281

Counsel for Integrity Healthcare, LLC, Verity Health
System of California, Inc.
T: 212 326 3795
E: akordas@jonesday.com

Joseph Corrigan
Iron Mountain Information Mgmt., LLC
One Federal Street
Boston, MA 02111

Counsel for Iron Mountain Information Management, LLC
T: 617 535 4744 / F: 617 451 0409
E: bankruptcy2@ironmountain.com

Steven M. Berman
Shumaker, Loop & Kendrick, LLP
101 E Kennedy Boulevard, Suite 2800
Tampa, FL 33602

Counsel for KForce, Inc.
T: 813 229 7600 / F: 813 229 1660
E: sberman@shumaker.com

Gary E. Klausner
Monica Y. Kim
Jeffrey S. Kwong
Levene Neale Bender Yoo & Brill
10250 Constellation Boulevard, Suite 1700
Los Angeles, CA 90067

Counsel for KPC Global Medical Center of San Mateo
County, LLC, Jacob Nathan Rubin (Health Care
Ombudsman), Strategic Global Management, Inc.
T: 310 229 3360 / F: 310 229 1244
E: gek/myk/jsk@lnbyg.com

Christopher E. Prince
Matthew A. Lesnick
Lesnick Prince & Pappas LLP
315 West 9th Street, Suite 705
Los Angeles, CA 90015

Counsel for Kaiser Foundation Hospitals
T: 213 291 8984 / F: 213 463 6596
E: cprince@lesnickprince.com; matt@lesnickprince.com

Ivan L. Kallick
Manatt, Phelps & Phillips, LLP
11355 West Olympic Boulevard, 6th Floor
Los Angeles, CA 90064

Interested Party
T: 310 312 4000
E: ikallick@manatt.com

Emily P. Rich
Jolene E. Kramer
Tracy L. Mainguy
Weinberg Roger & Rosenfeld
1001 Marina Village Parkway, Suite 200
Alameda, CA 94501

Counsel for Lynn C. Morris, Hilda L. Daily, Noe Guzman,
SEIU United Healthcare Workers West, Stationary
Engineers Local 39, Stationary Engineers Local 39
H&W Trust Fund, Stationary Engineers Local 39
Pension Trust Fund
T: 510 337 1001 / F: 510 337 1023
E: erich/jkramer/bankruptcycourtnotices
@unioncounsel.net

Anthony Dutra
Neal L. Wolf
Hanson Bridgett LLP
425 Market Street, 26th Floor
San Francisco, CA 94105

Counsel for Local Initiative Health Authority for Los
Angeles County, dba L.A. Care Health Plan, San Jose
Medical Group, Inc., Sports, Orthopedic &
Rehabilitation Assoc.
T: 415 777 3200 / F: 415 541 9366
E: adutra/nwolf@hansonbridgett.com

Paul R. Glassman
Fred Neufeld
Stradling Yocca Carlson & Rauth
10100 Santa Monica Boulevard, Suite 1400
Los Angeles, CA 90067

Counsel for Long Beach Memorial Medical Center,
Premier, Inc.
T: 424 214 7021 / F: 424 214 7010
E: pglassman/fneufeld@stradlinglaw.com

Kyra E. Andrassy
Smiley Wang-Ekvall, LLP
3200 Park Center Drive, Suite 250
Costa Mesa, CA 92626

Counsel for MGH Painting, Inc., Transplant Connect, Inc.
T: 714 445 1000 / F: 714 445 1002
E: kandrassy@raineslaw.com

Benjamin Ikuta
Hodes Milman, LLP
9210 Irvine Center Drive
Irvine, CA 92618

Counsel for Bill Ma
T: 949 640 8222 / F: 949 336 8114
E: bikuta@hml.law

Lauren A. Deeb
Nelson Mullins Riley & Scarborough
19191 South Vermont Avenue, Suite 900
Torrance, CA 90502

Counsel for McKesson Corp., McKesson Technologies,
Inc. n/k/a Change Health Care Technologies, LLC
T: 424 221 7400 / F: 424 221 7499
E: lauren.deeb@hoganlovells.com

Jeffrey Garfinkle
Buchalter PC
18400 Von Karman Avenue, Suite 800
Irvine, CA 92612

Counsel for McKesson Corp.
T: 949 760 1121 / F: 949 720 0182
E: jgarfinkle@buchalter.com

Michael S. Held
Hunton & Williams LLP
1445 Ross Avenue, Suite 3700
Dallas, TX 75202-2799

Counsel for Medecision, Inc.
T: 214 468 3334 / F: 214 740 7130
E: mheld@jw.com

Michael Hogue
Greenberg Traurig LLP
4 Embarcadero Center, Suite 3000
San Francisco, CA 94111

Counsel for Medical Anesthesia Consultants Medical
Group, Inc., RightSourcing, Inc., Workday, Inc.
T: 415 655 1300 / F: 415 707 2010
E: hoguem@gtlaw.com

Anna Gumport
Matthew E. Linder
Dennis M. Twomey
John Patrick White
Sidley Austin LLP
555 West 5th Street, Suite 4000
Los Angeles, CA 90013

Counsel for Medical Office Buildings of California, LLC
T: 415 655 1300 / F: 415 707 2010
E: agumport@sidley.com

Michael St. James
St. James Law
155 Montgomery Street, Suite 1004
San Francisco, CA 94104-4115

Counsel for Medical Staff of Seton Medical Center
T: 415 391 7566 / F: 415 391 7568
E: ecf@stjames-law.com

M. Douglas Flahaut
Arent Fox, LLP
555 West 5th Street, 48th Floor
Los Angeles, CA 90013

Counsel for Medline Industries, Inc.
T: 213 443 7559 / F: 213 629 7401
E: df@echoparklegal.com

Robert M. Hirsh
Lowenstein Sandler LLP
1251 Avenue of the Americas
New York, NY 10020

Counsel for Medline Industries, Inc.
T: 212 262 6700 / F: 212 262 7402
E: robert.hirsh@nortonrosefulbright.com

David M. Guess
Greenberg Traurig, LLP
18565 Jamboree Road, Suite 500
Irvine, CA 92612

Counsel for Medtronic USA, Inc., NTT DATA Services
Holding Corp.
T: 949 732 6500 / F: 949 732 6501
E: dguess@buchalter.com

Nathan A. Schultz
Law Office of Nathan A. Schultz PC
10621 Craig Road
Traverse City, MI 49686

Counsel for Microsoft Corp., Swinerton Builders
T: 310 429 7128
E: nschultzesq@gmail.com

Patrick J. Mulligan
Bressler, Amery & Ross PC
2001 Park Place, Suite 1500
Birmingham, AL 35203

Counsel for Musculoskeletal Transplant Foundation
T: 205 820 8235 / F: 205 719 5000
E: pmulligan@bressler.com

Mitchell D. Cohen
Scott Olson
Vedder Price
275 Battery Street, Suite 2464
San Francisco, CA 94111

Counsel for NFS Leasing Inc.
T: 415 749 9500 / F: 415 749 9502
E: scott.olson@bclplaw.com

Lesley A. Riis
Devaney Pate Morris & Cameron, LLP
402 West Broadway, Suite 1300
San Diego, CA 92101

Counsel for NFS Leasing Inc.
T: 619 354 5030 / F: 619 354 5035
E: lriis@dpmclaw.com

Lloyd S. Mann
15233 Ventura Boulevard, Suite 714
Sherman Oaks, CA 91403

Counsel for NHP/PMB St. Francis Lynwood Medical Plaza,
LLC
T: 818 789 0510 / F: 818 789 0518
E: Lmann@themannlaw.com

Shawn M. Christianson
Valerie Bantner Peo
Buchalter PC
425 Market Street, Suite 2900
San Francisco, CA 94105

Counsel for NTT Data Services, LLC, Oracle America, Inc.
T: 415 227 0900 / F: 415 227 0770
E: cmcintire/vbantnerpeo@buchalter.com

Sabrina L. Streusand
Streusand Landon Ozburn Lemmon LLP
Spyglass Point, Suite 320
1801 South MoPac Expressway
Austin, TX 78746

Counsel for NTT Data Services, LLC
T: 512 236 9900 / F: 512 236 9904
E: streusand@slollp.com

Bruce Bennett
Jones Day
555 South Flower Street, 50th Floor
Los Angeles, CA 90071

Counsel for NantHealth, Inc., Nantworks, LLC, The
Purchaser, Verity MOB Financing II LLC, Verity MOB
Financing LLC
T: 213 489 3939 / F: 213 243 2539
E: bbennett@jonesday.com

R. Gibson Pagter, Jr.
Pagter & Perry Isaacson, APLC
525 North Cabrillo Park Drive, Suite 104
Santa Ana, CA 92701

Counsel for Princess & Kehau Naope, Quest Diagnostics,
Inc.
T: 714 541 6072 / F: 714 541 6897
E: gibson@ppilawyers.com

Cecelia Valentine
National Labor Relations Board, Region 21
321 North Spring Street, 10th Floor
Los Angeles, CA 90012

Counsel for National Labor Relations Board
T: 213 634 6523 / F: 213 894 2778
E: cecelia.valentine@nrlrb.gov

Steven D. Wyllie
National Labor Relations Board
11500 West Olympic Boulevard, Suite 600
Los Angeles, CA 90035

Counsel for National Labor Relations Board, Region 31
T: 310 307 7312 / F: 310 235 7420
E: steven.wyllie@nrlrb.gov

Florice Hoffman
Law Office of Florice Hoffman LC
8502 East Chapman Avenue, Suite 353
Orange, CA 92869

Counsel for National Union of Healthcare Workers
T: 626 524 5965 / F: 714 282 1179
E: fhoffman@socal.rr.com

Ralph J. Swanson
Berliner Cohen
10 Almaden Boulevard, 11th Floor
San Jose, CA 95113

Counsel for O'Connor Building LLC
T: 408 286 5800 / F: 408 998 5388
E: ralph.swanson@berliner.com

Jennifer L. Nassiri
Quinn Emanuel Urquhart & Sullivan LLP
865 South Figueroa Street
Los Angeles, CA 90017

Counsel for Old Republic Insurance Co., et al.
T: 213 443 3000 / F: 213 443 3100
E: jnassiri@sheppardmullin.com

Giovanni Orantes
Orantes Law Firm PC
3435 Wilshire Boulevard, 27th Floor
Los Angeles, CA 90010

Counsel for The Orantes Law Firm, P.C., Seoul Medical
Group Inc.
T: 888 619 8222 / F: 877 789 5776
E: go@gobklaw.com

Eric D. Goldberg
DLA Piper LLP
2000 Avenue of the Stars, Suite 400 North Tower
Los Angeles, CA 90067

Counsel for Otsuka Pharmaceutical Development &
Commercialization, Inc.
T: 310 595 3000 / F: 310 595 3357
E: eric.goldberg@dlapiper.com

Lawrence A. Jacobson
Cohen and Jacobson LLP
900 Veterans Boulevard, Suite 600
Redwood City, CA 94063

Counsel for Michael Pacelli
T: 650 261 6280 / F: 650 368 6221
E: laj@cohenandjacobson.com

Monique D. Jewett-Brewster
Hopkins & Carley
70 South 1st Street
San Jose, CA 95113

Counsel for Paragon Mechanical, Inc.
T: 408 286 9800 / F: 408 998 4790
E: monique.jewettbrewster@lathropgpm.com

Amir Gamliel
Perkins Coie
1888 Century Park East, Suite 1700
Los Angeles, CA 90067

Counsel for Parallon Revenue Cycle Services, Inc. f/k/a
The Outsource Group, Inc., Quadramed Affinity Corp. &
Picis Clinical Solutions Inc.
T: 310 788 3276 / F: 310 843 1246
E: amir-gamliel-9554@ecf.pacerpro.com

Lori A. Butler
Melissa T. Harris
Cameo M. Kaisler
Pension Benefit Guaranty Corp.
445 12th Street, S.W.
Washington, DC 20024

Counsel for Pension Benefit Guaranty Corp.
T: 202 326 4020 / F: 202 326 4112
E: butler.lori/harris.melissa/salembier.cameo@pbgc.gov

Angela Z. Miller
Phillips Lytle LLP
One Canalside 125 Main Street
Buffalo, NY 14203

Counsel for Phillips Lytle LLP
T: 716 847 7060 / F: 716 852 6100
E: amiller@phillipslytle.com

Thomas M. Geher
Marianne Martin
Jeffer Mangles Butler & Mitchell LLP
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067

Counsel for Premier, Inc.
T: 310 203 8080 / F: 310 203 0567
E: tmg/mmartin@jmbm.com

Kerri A. Lyman
Jeffrey M. Reisner
Steptoe & Johnson LLP
633 West 5th Street, Suite 1900
Los Angeles, CA 90071

Counsel for Prime Healthcare Management, Inc.
T: 213 439 9423 / F: 213 429 9599
E: klyman/jreisner@steptoe.com

Jason D. Strabo
McDermott Will & Emery LLP
2049 Century Park East, 38th Floor
Los Angeles, CA 90067

Counsel for Prime Healthcare Services, Inc., U.S. Bank
N.A. as Indenture Trustee
T: 310 788 4125 / F: 310 277 4730
E: jstrabo@mwe.com

Sasha M. Gurvitz
Klee Tuchin Bogdanoff & Stern LLP
1999 Avenue of the Stars, 38th Floor
Los Angeles, CA 90067

Counsel for Prospect Medical Holdings, Inc.
T: 310 407 4032 / F: 310 407 9090
E: sgurvitz@ktbslaw.com

Schuyler Carroll
Manatt, Phelps & Phillips
7 Times Square
New York, NY 10036

Counsel for Quadramed Affinity Corp. & Picis Clinical
Solutions Inc.
T: 212 790 4521
E: SCarroll@manatt.com

Karl E. Block
Bernard R. Given, II
Benjamin R. King
Noah Weingarten
Loeb & Loeb LLP
10100 Santa Monica Boulevard, Suite 2200
Los Angeles, CA 90067

Counsel for Quadramed Affinity Corp. & Picis Clinical
Solutions Inc., SCAN Health Plan
T: 310 282 2000 / F: 310 282 2200
E: kblock/bgiven/bking/nweingarten@loeb.com

Simon Aron
Wolf, Rifkin, Shapiro & Schulman LLP
11400 West Olympic Boulevard, 9th Floor
Los Angeles, CA 90064-1565

Counsel for RCB Equities #1, LLC
T: 310 478 4100 / 310 479 14221
E: saron@wrslawyers.com

Richard A. Lapping
540 Pacific Avenue
San Francisco, CA 94133

Counsel for Retirement Plan for Hospital Employees
T: 415 399 1015 / 415 399 1038
E: richard.lapping@gmail.com

Mark A. Serlin
900 Howe Avenue, Suite 250
Sacramento, CA 95825

Counsel for RightSourcing, Inc.
T: 916 446 0790 / 916 446 0791
E: ms@swllplaw.com

Stephen F Biegenzahn
Law Offices of Stephen F. Biegenzahn
Ste. 304
Pasadena, CA 92614-5869

Counsel for Josefina Robles
T: 213 925 7395 / F: 626 744 3167
E: steve@sfblaw.com

Kayla D. Britton
Faegre Drinker Biddle & Reath LLP
600 East 96th Street, Suite 600
Indianapolis, IN 46240

Counsel for Roche Diagnostics Corp.
T: 317 569 9600 / F: 317 569 4800
E: kayla.britton@faegredrinker.com

Tarifa Laddon
Faegre Drinker Biddle & Reath LLP
1800 Century Park East, Suite 1500
Los Angeles, CA 90067

Counsel for Roche Diagnostics Corp.
T: 310 203 4000 / F: 310 229 1285
E: tarifa.laddon@faegredrinker.com

David M. Powlen
Kevin Collins
Barnes and Thornburg LLP
1000 North West Street, Suite 1500
Wilmington, DE 19801

Counsel for Roche Diagnostics Corp.
T: 302 300 3434 / F: 302 300 3456
E: david.powlen/kevin.collins@btlaw.com

James A. Hayes, Jr.
Zinser Hayes
23 Corporate Plaza, Suite 150
Newport Beach, CA 92658

Counsel for Royal West Development, Inc.
T: 949 566 8505 / F: 949 209 0315
E: jhayes@zinserhayes.com

Virginia Hoyt
State Compensation Insurance Fund
5880 Owens Drive
Pleasanton, CA 94588

Counsel for State Compensation Insurance Fund
T: 925 416 7405 / F: 925 523 5670
E: scif.legal.bk@scif.com

Steven G. Polard
Ropers Majeski PC
445 South Figueroa Street, Suite 3000
Los Angeles, CA 90071

Counsel for Schwalb Consulting, Inc.
T: 213 312 2044 / F: 213 312 2001
E: steven.polard@ropers.com

Akop J. Nalbandyan
Levin & Nalbandyan LLP
811 Wilshire Boulevard, Suite 800
Los Angeles, CA 90017

Counsel for Jason Michael Shank
T: 213 232 4848 / F: 213 232 4849
E: jnalbandyan@LNtriallawyers.com

David N. Crapo
Gibbons PC
One Gateway Center
Newark, NJ 07102

Counsel for Sharp Electronics Corp.
T: 973 596 4500 / F: 973 596 6333
E: dcrapo@gibbonslaw.com

Gregory M. Salvato
Salvato Boufadel LLP
777 South Figueroa Street, Suite 2800
Los Angeles, CA 90017

Counsel for Cynthia Sorto
T: 213 484 8400
E: gsalvato@salvatoboufadel.com

Brian D. Huben
Dustin P. Branch
Charles E. Nelson
Ballard Spahr LLP
2029 Century Park East, Suite 1400
Los Angeles, CA 90067-2915

Counsel for Southeast Medical Center, LLC & Slauson
Associates of Huntington Park, LLC, Wells Fargo Bank,
N.A., as indenture trustee
T: 424 204 4353 / F: 424 204 4350
E: hubenb/branchd/nelsonc@ballardspahr.com

Lauren T. Attard
Jimmy D. Parrish
Baker & Hostetler LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, CA 90025

Counsel for SpecialtyCare Cardiovascular Resources, LLC
T: 310 820 8800 / F: 310 820 8859
E: lattard/jparrish@bakerlaw.com

Nathaniel M. Leeds
Mitchell Leeds, LLP
555 California Street, Suite 4925
San Francisco, CA 94104

Counsel for Christopher Steele
T: 415 659 1555 / F: 415 276 9099
E: nathaniel@mitchelllawsf.com

Lori L. Purkey
Purkey and Assoc PLC
2251 East Paris Avenue SE, Suite B
Grand Rapids, MI 49546

Counsel for Stryker Corp.
T: 616 940 0553 / F: 616 940 0554
E: bareham@purkeyandassociates.com

Ori Katz
4 Embarcadero Center, 17th Floor
San Francisco, CA 94111

Counsel for Sunquest Information Systems, Inc.
T: 415 774 3238 / F: 415 434 3947
E: okatz@sheppardmullin.com

Robert S. Lampl
Law Office of Robert S. Lampl
21031 Ventura Boulevard, Suite 640
Woodland Hills, CA 91364-2203

Counsel for Surgical Information Systems, LLC, Darryl S.
Laddin Sysco Los Angeles, Inc.
T: 818 226 5662 / F: 818 226 5671
E: advocate45@aol.com

Terrel Ross
TR Capital Management LLC
265 Sunrise Highway, Suite 42
Rockville Center, NY 11570

Counsel for TR Capital Management LLC
T: 516 255 1801 / F: 516 255 1803
E: tross@trcmllc.com

Jeff D. Kahane
Robert Kum
Duane Morris LLP
865 South Figueroa Street, Suite 3100
Los Angeles, CA 90017

Counsel for The Chubb Companies
T: 213 689 7400
E: jkahane@duanemorris.com

Howard Camhi
Michelman & Robinson, LLP
10880 Wilshire Boulevard, 19th Floor
Los Angeles, CA 90024

Counsel for The Huntington National Bank
T: 310 299 5500 / F: 310 299 5600
E: hcamhi@mrlp.com

John R. O'Keefe, Jr.
Metz Lewis Brodman Must O'Keefe LLC
535 Smithfield Street, Suite 800
Pittsburgh, PA 15222

Counsel for The Huntington National Bank
T: 412 918 1100 / F: 412 918 1199
E: jokeefe@metzlewis.com

Paul J. Pascuzzi
Jason E. Rios
Felderstein Fitzgerald Willoughby Pascuzzi
500 Capitol Mall Suite 2250
Sacramento, CA 95814

Counsel for Toyon Associates, Inc.
T: 916 329 7400
E: ppascuzzi/jrios@ffwplaw.com

Paul J. Leeds
401 West A Street, Suite 2600
San Diego, CA 92101

Counsel for Transplant Management Group, LLC
T: 619 236 1551 / F: 619 696 1410
E: pleeds@fsl.law

Kevin Meek
Robins Kaplan LLP
2049 Century Park East, Suite 3400
Los Angeles, CA 90067

Counsel for U.S. Bank N.A. as Indenture Trustee
T: 310 552 0130 / F: 310 229 5800
E: kmeek@robinskaplan.com

Abigail V. O'Brient
Mintz Levin Cohn Ferris Glovsky & Popeo, PC
2029 Century Park East, Suite 3100
Los Angeles, CA 90067

Counsel for UMB Bank, N.A., as master indenture trustee
and Wells Fargo Bank, N.A., as indenture trustee
T: 310 586 3200 / F: 310 586 3202
E: aobrient@cov.com

Aaron Davis
Sharon Z. Weiss
Bryan Cave LLP
161 North Clark Street, Suite 4300
Chicago, IL 60601

Counsel for US Foods, Inc.
T: 310 576 2100 / F: 310 576 2200
E: aaron.davis@bryancave.com
sharon.weiss@bclplaw.com

Seth B. Shapiro
United States Department of Justice
1100 L Street N.W., 10th Floor Rm 10012
Washington, DC 20005

Counsel for United States Department of Health and
Human Services
T: 202 514 7164 / F: 202 307 0494
E: seth.shapiro@usdoj.gov

Alvin Mar
David Samuel Shevitz
Hatty K. Yip
Office of the United States Trustee
915 Wilshire Boulevard, Suite 1850
Los Angeles, CA 90017

Counsel for United States Trustee (LA)
T: 213 894 4219 / F: 213 894 2603
E: alvin.mar/david.s.shevitz/hatty.yip@usdoj.gov

J. Alexandra Rhim
Hemar, Rousso & Heald, LLP
15910 Ventura Boulevard, 12th Floor
Encino, CA 91436

Counsel for University of Southern California
T: 818 907 3135 / F: 818 501 2985
E: arhim@lakklawyers.com

Anthony Bisconti
Bienert Katzman PC
601 West 5th Street, Suite 720
Los Angeles, CA 90071

Counsel for VHS Liquidating Trust
T: 213 528 3400 / F: 949 369 3701
E: tbisconti@bklwlaw.com

Lisa Lenherr
Wendel Rosen LLP
1111 Broadway, 24th Floor
Oakland, CA 94607

Counsel for Varian Medical Systems, Inc.
T:
E: llenherr@fennemorelaw.com

Shirley Cho
Steven J. Kahn
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, CA 90067-4100

Counsel for Verity Health System of California, Inc.
T: 310 277 6910 / F: 310 201 0760
E: scho/skahn@pszjlaw.com

Kerry L. Duffy
Bartko Zankel Bunzel & Miller
One Embarcadero Center, Suite 800
San Francisco, CA 94111

Counsel for Verity Health System of California, Inc.
T: 415 956 1900 / F: 415 956 1152
E: kduffy@bartkolaw.com

Lawrence B. Gill
Nelson Hardiman LLP
1100 Glendon Avenue, Suite 1400
Los Angeles, CA 90024

Counsel for Verity Health System of California, Inc.
T: 310 203 2800 / F: 310 203 2727
E: lgill@nelsonhardiman.com

Mary H. Haas
Davis Wright Tremaine LLP
865 South Figueroa Street, Suite 2400
Los Angeles, CA 90017

Counsel for Verity Health System of California, Inc.
T: 213 633 6800 / F: 213 633 6899
E: maryhaas@dwt.com

William C. Beall
Beall and Burkhardt, APC
1114 State Street, Suite 200
Santa Barbara, CA 93101

Counsel for Wave Form Systems, Inc.
T: 805 966 6774 / F: 805 963 5988
E: will@beallandburkhardt.com

David K. Eldan
James M. Toma
State of California Dep't of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013

Counsel for Xavier Becerra, Attorney General of California
T: 213 269 6041 / F: 916 731 2145
E: david.eldan/james.toma@doj.ca.gov

Richard W. Esterkin
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132

Counsel for Zimmer US, Inc.
T: 213 612 2500 / F: 213 612 2501
E: richard.esterkin@morganlewis.com

2. SERVED BY UNITED STATES MAIL: On August 13, 2025, I served the following persons and/or entities at the last known addresses in this case 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.

Richard Reding
ASK LLP
2600 Eagan Woods Drive, Suite 400
St Paul, MN 55121

Counsel for ASK LLP

David A. Rosenzweig
Norton Rose Fulbright US LLP
1301 Avenue of the Americas
New York, NY 10019-6022

Counsel for AT&T Corp., AT&T Services, Inc. & their
affiliates
T: 212 318 3035
E:

Samuel C. Wisotzkey
Kohner, Mann & Kailas SC
Washington Building, 2nd Floor
4650 North Port Washington Road
Milwaukee, WI 53212-1077

Counsel for Abbott Laboratories Inc.

Scott A. Zuber
CSG Law
105 Eisenhower Parkway
Roseland, NJ 07068

Counsel for Cardinal Health
T: 973 325 1500 / F: 973 530 2246
E: szuber@csglaw.com

Elizabeth Berke-Dreyfuss
Wendel, Rosen, Black & Dean
1111 Broadway 24th Floor
Oakland, CA 94607

Counsel for Center for Dermatology, Cosmetic and Laser
Surgery
T: 510 834 6600
E: edreyfuss@wendel.com

Drew S. McGehrin
Wendy M. Simkulak
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19102

Counsel for Chubb Companies

Gregory F. Pesce
Scott J. Vail
Kirkland & Ellis LLP
300 North LaSalle Street
Chicago, IL 60654

Counsel for Conifer Health Solutions, LLC

Nathan F Coco, James Kapp & Megan Preusker
McDermott Will & Emery
444 West Lake Street
Chicago, IL 60606-0029

Counsel for County of Santa Clara; U.S. Bank National
Association, not individually, but as Indenture Trustee
T: 312 372 2000 / 312 984 7700

Kamilah Holmes
Belal Hamideh Law PC
111 West Ocean Boulevard, Suite 424
Long Beach, CA 90802

Counsel for Ebtissam Saleh et al
T: 562 276 2140

Martha Dahdah
Law Office of Martha Dahdah
4040 Almond Street
Riverside, CA 92501

Counsel for Federico Fuentes, Irene Fuentes

Steven C. Peck
Law Offices of Steven C. Peck
6454 Van Nuys Boulevard, Suite 150
Van Nuys, CA 91401

Counsel for Myung Soo Han
T: 818 756 2022 / F: 818 908 1158

Kristina Paszek
San Mateo County Counsel's Office
400 County Center, 6th Floor
Redwood City, CA 94063

Counsel for Health Plan of San Mateo
T: 650 363 4989

Bruce J. Highman
582 Market Street, Suite 1212
San Francisco, CA 94104

Counsel for Mary Meeko

Rachel C. Quimby
Daglian Law Group APLC
701 North Brand Boulevard, Suite 610
Glendale, CA 91203

Counsel for Noble Williams
T: 818 545 7700 / F: 818 545 3700

Phillip G. Vermont
Randick O'Dea & Tooliatos LLP
5000 Hopyard Road, Suite 225
Pleasanton, CA 94588

Counsel for O'Connor Health Center 1, a California Limited
Partnership
T: 925 460 3700 / F: 925 460 0969

Dennis H. Boothe
Dennis H. Boothe Inc.
49179 Cochran Drive
Indio, CA 92201-8101

Counsel for Elisa O'Halloran
T: 661 513 7877

Margaret M Anderson
Ryan Schultz
Fox Swibel Levin & Carroll LLP
200 West Madison Street
Chicago, IL 60606

Counsel for Old Republic Insurance Company, et al

Marshall F. Goldberg
Glass & Goldberg
22917 Burbank Boulevard
Woodland Hills, CA 91367

Counsel for Phillips Medical Capital & Phillips Medical
Capital LLC
T: 818 888 2220 / F: 818 888 2229
E: mgoldberg@glassgoldberg.com

Kevin P. Duthoy
13215 East Penn Street Suite 510
Whittier, CA 90602-1797

Counsel for PIH Health Hospital – Downey and PIH Health
Hospital – Whittier
T: 562 698 9771

Matthew S. Walker
Pillsbury Winthrop Shaw Pittman LLP
12255 El Camino Real, Suite 300
San Diego, CA 92130

Counsel for Packard Children's Health Alliance, Stanford
Blood Center, LLC, Stanford Health Care, Stanford
Health Care Advantage, The Board of Trustees of the
Leland Stanford Junior University, University Healthcare
Alliance
T: 619 234 5000 / F: 858 509 4010
E: matthewswalker1@gmail.com

Nelson C. Barry, III
Law Offices of Nelson C. Barry, III
5228 Diamond Heights Boulevard
San Francisco, CA 94131

Counsel for Theodore Parada MD
T: 415 587 0550 / F: 415 587 1211

John D. Penn
Perkins Coie LLP
500 North Akard Street, Suite 3300
Dallas, TX 75201

Counsel for Parallon Revenue Cycle Services, Inc. f/k/a
The Outsource Group, Inc.

John D. Elrod
Greenberg Traurig, LLP
Terminus 200, 3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305

Counsel for RightSourcing, Inc., Workday, Inc.

Christian T. Kim
Dumas & Kim, APC,
915 Wilshire Boulevard, Suite 1775
Los Angeles, CA 90017-3575

Counsel for Irene Rodriguez
T: 213 368 5000 / F: 213 368 5009
E: ckim@dumas-law.com

Daniel B. Besikof
Loeb & Loeb LLP
345 Park Avenue
New York, NY 10154-0004

Counsel for SCAN Health Plan
T: 212 407 4129

Shannon E. Daily
Hunton Andrews Kurth LLP
951 East Byrd Street
Richmond, VA 23219-4074

Counsel for Smith & Nephew, Inc.

Judy D. Thompson
J.D. Thompson Law
P.O. Box 33127
Charlotte, NC 28233

Counsel for Sodexo, Inc.

Robert G. Harris
Binder & Malter, LLP
2775 Park Avenue
Santa Clara, CA 95050

Counsel for Software Information Systems, LLC
T: 408 295 1700 / F: 408 295 1531
E: rob@bindermalter.com

Lorraine K. Hall
Law Offices of Michael D. Gonzalez
101 North Brand Boulevard, Suite 1880
Glendale, CA 91203

Counsel for St Francis Medical Center

Donald R Kirk
John Ryan Yant
Carlton Fields Jorden Burt, P.A.
4221 West Boy Scout Boulevard, Suite 1000
Tampa, FL 33607-5780

Counsel for St. Vincent IPA Medical Corporation

Jason M. Reed, Clark T. Whitmore
Maslon LLP
225 South 6th Street, Suite 2900
Minneapolis, MN 55402

Counsel for U.S. Bank National Association, not
individually, but as Indenture Trustee
T: 612 672 8200 / F: 612 642 8301

Daniel S. Bleck
Ian A. Hammel
Mintz Levin Cohn Ferris Glovsky & Popeo, PC
One Financial Center
Boston, MA 02111

Counsel for UMB Bank, N.A., as master indenture trustee
and Wells Fargo Bank, National Association, as
indenture trustee

Paul J. Ricotta [retired]
Kaitlin R. Walsh
Mintz Levin Cohn Ferris Glovsky & Popeo, PC
919 Third Avenue
New York, NY 10022

Counsel for UMB Bank, N.A., as master indenture trustee
and Wells Fargo Bank, National Association, as
indenture trustee

David E. Ahdoot
Joseph A. Kohanski
Bush Gottlieb
801 North Brand Boulevard, Suite 950
Glendale, CA 91203

Counsel for United Nurses Associations of CA/Union of
Health Care Professionals
T: 818 973 3200 / F: 818 973 3201
E: dahdoot/jkohanski@bushgottlieb.com

Eric S. Goldstein
Shipman & Goodwin LLP
One Constitution Plaza
Hartford, CT 06103

Counsel for UnitedHealthcare Insurance Company
T: 860 251 5059

Benjamin Rosenblum
Peter Saba
Jones Day
250 Vesey Street
New York, NY 10281

Counsel for Verity MOB Financing II LLC, Verity MOB
Financing LLC
T: 212 326 3939 / F: 212 755 7306

William P. Wassweiler
Ballard Spahr LLP
80 South 8th Street, Suite 2000
Minneapolis, MN 55402

Counsel for Wells Fargo Bank, National Association, as
indenture trustee

Joshua K. Partington
Snell & Wilmer
600 Anton Boulevard, Suite 1400
Costa Mesa, CA 92626

Counsel for Wells Fargo Vendor Financial Services, LLC
T: 714 427 7000 / F: 714 427 7799
E: jpartington@swlaw.com

Thomas J. Polis
Polis & Associates, APLC
19800 MacArthur Boulevard, Suite 1000
Irvine, CA 92612-2433

Counsel for Florencio Zabala; Maria Zavala
T: 949 862 0040 / F: 949 862 0041
E: tom@polis-law.com

American National Red Cross
2025 E Street NW
Washington, DC 20006

Arent Fox LLP
555 West 5th Street, 48th Floor
Los Angeles, CA 90013

Arup Laboratories
c/o Fennemore Dowling Aaron
Attn: Don Pool
8080 North Palm Avenue, 3rd Floor
Fresno, CA 93711

Cain Brothers,
a division of KeyBanc Capital Markets
One California
1 California Street
San Francisco, CA 94111

Lindsey Chow
Susan Chan Chow
1662½ Cortez Street
Los Angeles, CA 90026

Maximo Correa & Hernandez Iris
% Raymond Ghermezian, APLC
8383 Wilshire Boulevard, Suite 1030
Beverly Hills, CA 90211-2409

Ecolab Institutional
655 Loan Oak Drive
Eagan, MN 55121

Refugio Estrada
% Katz Law, APC
5850 Canoga Avenue, 4th Floor
Woodland Hills, CA 91367-6554

FFF Enterprises, Inc.
44000 Winchester Road
Temecula, CA 92590

HSS Inc.
990 South Broadway, Suite 100
Denver, CO 80209

Masimo Corporation
52 Discovery
Irvine, CA 92618

Ramon Naguiat
Reorg Research Inc.
11 East 26th Street, 12th Floor
New York, NY 10010

Natalie Nguyen
4302 Rio Hondo Avenue
Rosemead, CA 91770

Christopher Rivas
Reed Smith
355 South Grand Avenue, Suite 2900
Los Angeles, CA 90071

J. Nathan Ruben
4955 Van Nuys Boulevard, Suite 308
Sherman Oaks, CA 91403

Lisa Swain
Dreyer Babich Buccola Wood Campora
20 Bicentennial Circle
Sacramento, CA 95826

Kimberly G. Roberts
Teletracking Technologies, Inc.
336 Fourth Ave., The Times Building
Pittsburgh, PA 15222

Jade M Williams
DLA Piper LLP US
444 West Lake Street, Suite 900
Chicago, IL 60606-0089

3. SERVED BY PERSONAL DELIVERY, NEXT BUSINESS DAY, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling Local Rules, on August 13, 2025, 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 or next business day delivery to the judge will be completed no later than 12:00 noon after the document is filed.

Honorable Sheri Bluebond
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1652 / Courtroom 1645
Los Angeles, CA 90012

- ☒ Until further notice, on all matters except for evidentiary hearings, no judge's copies are required unless specifically requested by chambers
- ☐ By Messenger w/NEF behind
- ☐ By Next Business Day
- ☐ By Facsimile to _____
- ☐ By Email to mb_chambers@cacb.uscourts.gov

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 13, 2025
Date

Geoffrey M. Miller
Printed Name

/s/ Geoffrey M. Miller
Signature

PROOF OF SERVICE – Case No. 2:18-bk-20151-BB

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