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**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. 2:19-bk-14146-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

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE FOR UNITED
STATES GOVERNMENT ATTORNEY
CAMERON WADE**



182015125111400000000004

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND**
2 **ITS ATTORNEY OF RECORD, UNITED STATES TRUSTEE, AND OTHER**
3 **INTERESTED PARTIES:**

4 **PLEASE TAKE NOTICE** that the Pension Benefit Guaranty Corporation (“PBGC”), an
5 agency of the United States Government and a creditor in the above-captioned cases, hereby files
6 this notice of appearance and request for electronic notice pursuant to Rule 9010(b) of the
7 Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and requests, pursuant to
8 Section 1109(b) of Title 11, United States Code and Bankruptcy Rules 2002(j)(4), 3017(d) and
9 9007, that notice of all matters which may come before the Court concerning the above-
10 captioned cases and debtors be given to and served upon PBGC as listed below.
11

12 This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules
13 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices
14 of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or
15 requests, and any other documents brought before this Court in this case, whether formal or
16 informal, ex parte or on notice, written or oral, or transmitted or conveyed by mail, electronic
17 mail, personal delivery, telephone, facsimile, or otherwise.
18

19 **PLEASE TAKE FURTHER NOTICE** that this entry of appearance and request for
20 notice is without prejudice to PBGC’s rights, remedies, and claims against other entities or any
21 objection that may be made to the jurisdiction or venue of the Court or venue of these cases, and
22 shall not be deemed or construed to be a waiver of PBGC’s rights: (i) to have final orders and
23 non-core matters entered only after *de novo* review by a district court, (ii) to trial by jury in any
24 proceedings so triable in this case or in any controversy or proceeding related to these cases, (iii)
25 to have the district court withdraw the reference in any matter subject to mandatory or
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1 discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or
2 recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC
3 expressly reserves.

4 Assistant U.S. Attorney Elan S. Levey filed an Application of Non-Resident Attorney to
5 Appear in a Specific Case for United States Government attorney Cameron Wade on August 13,
6 2025 [Dkt. 6881]. The Application was granted on August 18, 2025 [Dkt. 6886].

8 Dated: November 7, 2025
9 Washington, D.C.

Respectfully submitted,

10 /s/ Cameron Wade
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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:
445 12th Street, S.W., Washington, D.C. 20024-2101

A true and correct copy of the foregoing document entitled (*specify*): Notice of Appearance And Request For Notice
For United States Government Attorney Cameron Wade

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*) 10/7/2025, 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*) _____, 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.

11/7/2025 Joselle M. Chatman
Date Printed Name

/s/ Joselle M. Chatman
Signature

PROOF OF SERVICE OF DOCUMENT (Attachment)

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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