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11 Proposed Counsel to Debtors and
Debtors in Possession

12 UNITED STATES BANKRUPTCY COURT
13 CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

14
15 In re:
16 BEVERLY COMMUNITY HOSPITAL
ASSOCIATION, dba BEVERLY HOSPITAL
17 (A NONPROFIT PUBLIC BENEFIT
CORPORATION), *et al.*¹

18 Debtors,

- 19
20 Affects all Debtors
21 Affects Beverly Community
Hospital Association
22 Montebello Community Health
Services, Inc.
23 Beverly Hospital Foundation
24

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

Joint administration requested with:

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

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

Hon. Sandra R. Klein

Chapter 11 Case

**NOTICE OF HEARINGS ON
EMERGENCY FIRST-DAY MOTIONS
FIELD BY DEBTORS**

Date: April 21, 2023

Time: 2:00 p.m.

Judge: Hon. Sandra R. Klein

Place: ZoomGov

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26
27 ¹ The Debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification
28 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 Blvd., Montebello, California 90640.



1 **PLEASE TAKE NOTICE** that the Honorable Sandra R. Klein, United States Bankruptcy
2 Judge for the Central District of California – Los Angeles Division, has scheduled an emergency
3 hearing on Friday, April 20, 2023, at 2:00 p.m., to consider the below-listed Emergency Motions
4 filed by the above-captioned debtors and debtors in possession (collectively, the “Debtors”) in their
5 jointly-administered chapter 11 bankruptcy cases.

6 **PLEASE TAKE FURTHER NOTICE** that the emergency hearing will be held via Zoom
7 Zoom:

8 <https://cacb.zoomgov.com/j/1616216653>

9 Meeting ID: 161 621 6653

10 Password: 026614

11 Phone: 669 254 5252

12 Additional information to access and attend the virtual hearing via ZoomGov can be
13 obtained on the Bankruptcy Court’s website by viewing Judge Klein’s tentative ruling calendar for
14 April 20, 2022.

15 **PLEASE TAKE FURTHER NOTICE** that the Emergency Motions, and other papers
16 filed in support of the Emergency Motions, in the chapter 11 cases are available free of charge at
17 <https://www.kccllc.net/Beverly>.

18 **PLEASE TAKE FURTHER NOTICE** that the Emergency Motions, and other papers
19 filed in support of the Emergency Motions, will be served upon you on April 20, 2023, via overnight
20 mail such that you will receive the Emergency Motions no later than April 21, 2023. Any parties
21 seeking to obtain additional copies may also do so by contacting proposed counsel to the Debtors
22 whose contact information is as follows: Sheppard, Mullin, Richter & Hampton LLP, Attn: Justin
23 R. Bernbrock, Email: jbernbrock@sheppardmullin.com, Catherine Jun, Email:
24 cjun@sheppardmullin.com, Robert B. McLellarn, Email: rmclellarn@sheppardmullin.com, Tel:
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26 Jennifer L. Nassiri, Email: jnassiri@sheppardmullin.com, Alexandria Lattner, Email:
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28 Suite 1600 Los Angeles, CA 90067-6055.

1 **PLEASE TAKE FURTHER NOTICE** that objections to the Emergency Motions must be
2 made in writing and filed with the Bankruptcy Court by 10:30am.

3 The Emergency Motions that the Court will consider are:

4 1. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the*
5 *Implementation of Procedures to Protect Confidential Patient Information, and (II) Granting*
6 *Related Relief;*

7 2. *Debtors' Emergency Motion for Entry of an Order (I) Limiting Scope of Notice, and*
8 *(II) Granting Related Relief;*

9 3. *Debtors' Emergency Motion for Entry of an Order (I) Approving the Debtors'*
10 *Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility*
11 *Companies from Altering, Refusing, or Discounting Services, (III) Approving the Debtors'*
12 *Proposed Procedures for Resolving Additional Assurance Requests, and (IV) Granting Related*
13 *Relief;*

14 4. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtor to*
15 *Maintain, Renew, or Supplement Their Insurance Policies and Honor All Obligations in Respect*
16 *Thereof, and (II) Granting Related Relief;*

17 5. *Debtors' Emergency Application For An Order (A) Appointing Kurtzman Carson*
18 *Consultants LLC as Claims and Noticing Agent, and (B) Approving the Form and Manner of Notice*
19 *of Case Commencement;*

20 6. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to*
21 *Maintain, Administer, Modify, and Renew Their Refund Programs and Practices and Honor*
22 *Obligations Related Thereto, and (II) Granting Related Relief;*

23 7. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing*
24 *the Debtors to (A) Pay Prepetition Wages, Salaries, and Other Compensation and (B) Continue*
25 *Employee Benefits Programs, and (II) Granting Related Relief;*

26 8. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing*
27 *the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain*
28

1 *Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform*
2 *Intercompany Transactions, and (III) Granting Related Relief;*

3 9. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing*
4 *the Debtors to Honor Prepetition Obligations to (A) Lien Claimants, (B) 503(b)(9) Claimants, and*
5 *(C) Critical Vendors; and (II) Granting Related Relief;*

6 10. *Debtors' Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing*
7 *the Debtors to Obtain Post-Petition Financing, (II) Granting Adequate Protection to Prepetition*
8 *Secured Creditors, and (III) Granting Related Relief; Memorandum of Points and Authorities in*
9 *Support Thereof;*

10 11. *Debtors' Emergency Motion for Order (A) Extending Time for Debtors to File*
11 *Schedules and Statements, (B) Authorizing the Debtors to File a Consolidated List of Creditors in*
12 *Lieu of Submitting a Separate Mailing List of Creditors For Each Debtor, (C) Authorizing the*
13 *Debtors To File a Consolidated List of the Top Thirty Largest Unsecured Creditors;*
14 *(D) Authorizing the Debtors to Redact Certain Personal Identification Information, and (E) Related*
15 *Relief;*

16 12. *Debtors' Emergency Motion For Order (I) Approving Debtors' Use Of Cash*
17 *Collateral, And (Ii) Setting A Final Hearing On The Use Of Cash Collateral; and*

18 13. *Debtors' Ex Parte Emergency Motion For Order (I) Directing Joint Administration*
19 *Of Chapter 11 Cases, And (Ii) Granting Related Relief; Declaration Of Alice Cheng.*

20 **The Related Pleadings to the Motions that the Court will Consider Are:**

21 1. *Declaration of Alice Cheng in Support of Chapter 11 Petitions and Emergency First*
22 *Day Motions;*

23 2. *Declaration of Jason Cohen in Support of the Debtors' Motion for Entry of Interim and*
24 *Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Adequate*
25 *Protection to the Prepetition Secured Parties, and (III) Granting Related Relief; and*

26 3. *Declaration of Alyssa Lozynski in Support of Debtors' Emergency Motion for Interim*
27 *and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting*
28 *Adequate Protection to Prepetition Secured Creditors, and (III) Granting Related Relief.*

