

1 SAMUEL R. MAIZEL (SBN 189301)  
 2 samuel.maizel@dentons.com  
 3 TANIA M. MOYRON (SBN 235736)  
 4 tania.moyron@dentons.com  
 5 DENTONS US LLP  
 6 601 South Figueroa Street, Suite 2500  
 7 Los Angeles, CA 90017-5704  
 8 Telephone: 213 623 9300  
 9 Facsimile: 213 623 9924

7 Proposed Attorneys for Chapter 11 Debtor and  
 8 Debtor In Possession

9 **UNITED STATES BANKRUPTCY COURT**  
 10 **SOUTHERN DISTRICT OF CALIFORNIA**

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

11  
 12 In re:  
 13  
 14 **BORREGO COMMUNITY HEALTH**  
 15 **FOUNDATION,**  
 16 Debtor and Debtor In Possession.

Case No. 22-02384-LT11

Chapter 11 Case

**NOTICE OF HEARING ON**  
**DEBTOR’S MOTION FOR ORDER**  
**APPROVING SALE AND BIDDING**  
**PROCEDURES**

[Docket No. 161]

Judge: Honorable Laura S. Taylor

Date: November 28, 2022

Time: 2:00 p.m.

Place: Jacob Weinberger United States  
 Courthouse  
 325 West F Street  
 San Diego, California 92101



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

1 **NOTICE OF HEARING ON DEBTOR’S NOTICE OF MOTION AND**  
2 **MOTION FOR THE ENTRY OF (I) AN ORDER APPROVING FORM OF**  
3 **ASSET PURCHASE AGREEMENT; (2) APPROVING AUCTION SALE**  
4 **FORMAT AND BIDDING PROCEDURES; (3) APPROVING PROCESS**  
5 **FOR DISCRETIONARY SELECTION OF STALKING HORSE BIDDER**  
6 **AND BID PROTECTIONS; (4) APPROVING FORM OF NOTICE TO BE**  
7 **PROVIDED TO INTERESTED PARTIES; (5) SCHEDULING A COURT**  
8 **HEARING TO CONSIDER APPROVAL OF THE SALE TO THE HIGHEST**  
9 **AND BEST BIDDER; AND (6) APPROVING PROCEDURES RELATED TO**  
10 **THE ASSUMPTION OF CERTAIN EXECUTORY CONTRACTS AND**  
11 **UNEXPIRED LEASES; AND (II) AN ORDER AUTHORIZING THE SALE**  
12 **OF PROPERTY FREE AND CLEAR OF ALL CLAIMS, LIENS AND**  
13 **ENCUMBRANCES**

14 **PLEASE TAKE NOTICE** that, on **November 28, 2022, at 2:00 p.m.**, the  
15 above-referenced Court will conduct a hearing (the “Hearing”) at the address set forth  
16 above on the *Debtor’s Motion for the Entry of (I) An Order Approving Form of Asset*  
17 *Purchase Agreement; (2) Approving Auction Sale Format and Bidding Procedures;*  
18 *(3) Approving Process for Discretionary Selection of Stalking Horse Bidder and Bid*  
19 *Protections; (4) Approving Form of Notice to Be Provided to Interested Parties; (5)*  
20 *Scheduling a Court Hearing to Consider Approval of the Sale to the Highest and Best*  
21 *Bidder; And (6) Approving Procedures Related to the Assumption of Certain*  
22 *Executory Contracts and Unexpired Leases; and (II) An Order Authorizing the Sale*  
23 *of Property Free and Clear of All Claims, Liens and Encumbrances [Docket No. 161]*  
24 filed by Borrego Community Health Foundation (the “Debtor”), in the above-  
25 captioned chapter 11 bankruptcy case.

26 **PLEASE TAKE FURTHER NOTICE** any opposition(s) to the Motion must  
27 be filed no later than **Friday, November 18, 2022**.

28 **PLEASE TAKE FURTHER NOTICE** that any reply to any oppositions will  
be made by Debtor at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that the Motion and other papers filed  
in support of the Motion, will be served upon parties required pursuant to Rule 9006-  
1(a), Rule 9013-4(a), and Rule 9013-9(d) of the Local Rules for the Bankruptcy Court  
for the Southern District of California, on November 10, 2022, via email, facsimile,  
personal service or other electronic means, or Express or Overnight Mail.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PLEASE TAKE FURTHER NOTICE** that a copy of all pleadings in the Case may be obtained from the Court’s website or through PACER (<https://pacer.uscourts.gov/>) or for free at <https://www.kccllc.net/BorregoHealth>. If any parties desires a hard copy of the Motion, Related Pleadings, and other papers filed in support of the Motion, parties may contact proposed counsel to the Debtor whose contact information whose contact information is set forth in the upper-left hand corner of this Notice.

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one.**

Dated: November 10, 2022

DENTONS US LLP  
SAMUEL R. MAIZEL  
TANIA M. MOYRON

By: /s/ Tania M. Moyron  
Tania M. Moyron

Proposed Attorneys for the Chapter 11  
Debtor and Debtor In Possession

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