

Exhibit A

to

IF's Motion for Court to Approve
Treatment of Remaining Outstanding Amounts
and Unpaid Claims Related to VNA

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20 Independent Fiduciary Receivership Management, Inc.

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 **MARTIN J. WALSH, Secretary of**
24 **Labor, United States Department of**
25 **Labor**

26 **Plaintiff,**

27 **v.**

28 **RIVERSTONE CAPITAL, LLC, a**
California limited liability
corporation; et al.,

Defendants.

CASE NO. 19-CV-778-MWF (MAAx)
Honorable Michael W. Fitzgerald

DECLARATION OF J. GRAHAM
MATHERNE IN SUPPORT OF
INDEPENDENT FIDUCIARY'S
MOTION FOR COURT TO
APPROVE RECOMMENDED
TREATMENT OF REMAINING
OBLIGATIONS AND UNPAID
CLAIMS RELATED TO VISITING
NURSE ASSOCIATION OF
INLAND COUNTIES ("VNA") AS
UNCOLLECTIBLE.

1 I, J. Graham Matherne, pursuant to 28 U.S.C. §1746, declare as follows:

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3 1. I am of majority age and have a personal knowledge of the facts stated
4 in this Declaration. I, amongst others, am counsel in this matter for Receivership
5 Management, Inc. (the Court-appointed Independent Fiduciary).

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7 2. Prior to the institution of this case and the appointment of the
8 Independent Fiduciary, Visiting Nurse Association of Inland (“VNA” or Debtor in
9 Possession or DIP), on August 15, 2018, filed a Chapter 11 bankruptcy case (In. Re:
10 Visiting Nurse Association of Inland Counties, #6:18-16908 (U.S. Bankr. C.D.
11 Cal)).

12
13 3. VNA ultimately confirmed a Plan of Liquidation in its Chapter 11
14 bankruptcy case, which provided for the transfer of bankruptcy estate assets into a
15 Liquidating Trust, the appointment of a Liquidating Trustee to pay allowed claims
16 of creditors to the extent of available Trust property and in the priority mandated by
17 bankruptcy law, and the dissolution of VNA. On March 15, 2022, the Liquidating
18 Trustee filed a Final Post Confirmation Report in the bankruptcy case reflecting the
19 disposition of all property of the Trust. On March 3, 2022, the court entered an
20 Order granting the Final Decree and closing the VNA bankruptcy case.
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I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct and that I executed this Declaration on January 30, 2023 in Nashville, Tennessee.



J. Graham Matherne

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