

2. The Foundation may redact personal information such as social security numbers, tax identification numbers, bank or other account numbers and similar information of a non-public nature.

3. The Foundation's initial response shall not waive its right to seek a confidentiality order for any additional documents the Receiver or Special Counsel might seek pursuant to the subpoena or any future subpoena, nor shall the Receiver or Special Counsel argue that the Foundation waived the right to seek such confidentiality as a result of any documents produced.

4. The Foundation's initial response shall not waive any objections set forth in the Letter concerning any additional documents, all such objections being specifically preserved, nor shall this stipulation waive any claim by the Receiver or Special Counsel in seeking additional documents under the subpoena that this initial response does not constitute complete compliance with the subpoena.

TEMPORARY RECEIVER/SPECIAL
COUNSEL

By his Attorneys

/s/ Stephen P. Sheehan
Stephen P. Sheehan (#4030)
Wistow, Sheehan & Loveley PC
61 Weybosset Street
Providence, RI 02903
T: (401) 831-2700
sps@wistbar.com

Dated: February 28, 2018

Non-Party RHODE ISLAND FOUNDATION

By its Attorneys

/s/ David A. Wollin

David A. Wollin (#4950)

Hinckley Allen & Snyder LLP

100 Westminster Street, Suite 1500

Providence, RI 02903-2319

T: (401) 274-2000

F: (401) 277-9600

dwoillin@hinckleyallen.com

Dated: February 28, 2018

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's Electronic Filing System.

/s/ David A. Wollin _____