STATE OF RHODE ISLAND PROVIDENCE, SC.	SUPERIOR COURT
ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND, INC.,	:
Plaintiff,	
v.	: C.A. No. PC-2017-3856
ST. JOSEPHS HEALTH SERVICES OF RHODE ISLAND RETIREMENT PLAN, as amended,	
Defendant.	:

STIPULATION

:

WHEREAS, the Receiver and Special Counsel served a subpoena on February 9, 2018, to the Rhode Island Foundation (the "Foundation") for certain documents, with a response date of February 28, 2018, and

WHEREAS, by letter dated September 22, 2018 (the "Letter"), the Foundation, through counsel, timely sent the Special Counsel responses and objections to the subpoena, and

WHEREAS, the Receiver, Special Counsel and the Foundation seek to avoid the further costs and expense of litigating the issue of the confidentiality of the documents the Foundation intends to produce pursuant to the subpoena as indicated in the Letter.

It is hereby stipulated and agreed that:

1. As an initial response, the Foundation shall produce the financial documents concerning what funds or other assets the Foundation received from SJHSRI, RWH, CCF, or CHARTERCARE and what happened to those funds or other assets, within two business days of the execution of this Stipulation.

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

<u>/s/ Stephen P. Sheehan</u> 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

Case Number: PC-2017-3856 Filed in Providence/Bristol County Superior Court Submitted: 2/28/2018 9:39:56 AM Envelope: 1431306 Reviewer: Alexa G.

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 dwollin@hinckleyallen.com

Dated: February 28, 2018

Case Number: PC-2017-3856 Filed in Providence/Bristol County Superior Court Submitted: 2/28/2018 9:39:56 AM Envelope: 1431306 Reviewer: Alexa G.

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