

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

ST. JOSEPH HEALTH SERVICES OF
RHODE ISLAND

vs.

ST. JOSEPHS HEALTH SERVICES OF
RHODE ISLAND RETIREMENT PLAN,
as amended

C.A. No. PC-2017-3856

STIPULATION

The Receivership Estate, St. Joseph Health Services of Rhode Island, Inc. (“SJHSRI”), and Prospect CharterCARE, LLC (“Prospect”) hereby stipulate and agree that with respect to the civil subpoenas issued to SJHSRI dated October 18, 2017 and to Prospect dated December 1, 2017 (collectively “the Subpoenas”), that insofar as SJHSRI has the right to access hard-copy documents in the possession or control of Prospect, they need only be produced once, by either SJHSRI or Prospect, but if SJHSRI or Prospect does not make the initial production, said party will review any such documents that were not included in such initial production and make an independent determination whether any of such documents should be produced, and will produce such documents, if any.

With respect to electronically stored information in the possession or control of Prospect that SJHSRI has the right to access, such information only needs to be produced once, by Prospect.

**ST. JOSEPH HOSPITAL SERVICES OF
RHODE ISLAND, INC.**

By its Attorneys,

/s/ Robert D. Fine

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**RESPONDENT
THE RECEIVERSHIP ESTATE,**

By its Attorneys,

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PROSPECT CHARTERCARE, LLC,

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Date: March 1, 2018

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2018 the within document was electronically filed and served through the Rhode Island Superior Court Case Management System by means of the electronic filing system (EFS) and is available for viewing and/or downloading by counsel of record.

/s/ Joseph V. Cavanagh, III