

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

_____ :
In re: :

CharterCARE Community Board, :

St. Joseph Health Services of :
Rhode Island, :

PB-2019-_____

And :

Roger Williams Hospital :
_____ :

**PETITION FOR JUDICIAL DISSOLUTION AND LIQUIDATION OF ASSETS AND
AFFAIRS PURSUANT TO R.I. GEN. LAWS § 7-6-60(a)(3) and § 7-6-61**

CharterCARE Community Board ("CCB"), Roger Williams Hospital ("RWH") and St. Joseph Health Services of Rhode Island ("SJHSRI" and together with CCB and RWH, "Petitioners") respectfully state as follows:

1. Petitioners are each a domestic non-profit corporation organized under the laws of the State of Rhode Island with a principal place of business located in Providence, Rhode Island.

2. RWH and SJHSRI are wholly-owned subsidiaries of CCB.

3. On August 18, 2017, SJHSRI filed a petition with the Rhode Island Superior Court seeking the appointment of a receiver for the St. Joseph Health Services of Rhode Island Retirement Plan (the "Plan").¹ The Court appointed Stephen Del Sesto, Esq. as Temporary Receiver and later Permanent Receiver of the Plan (the "Plan Receiver").

4. On June 18, 2018, the Plan Receiver filed a Motion for Leave to Intervene in the case captioned *In re: CharterCARE Health Partners Foundation, Roger Williams Hospital and St. Joseph Health Services of Rhode Island*, C.A. No. KM-2015-0035 (the "2015 Cy Pres Proceeding").

5. On June 18, 2018, the Plan Receiver, together with several beneficiaries of the Plan (collectively with the Plan Receiver, the "Plan Plaintiffs"), filed Complaints in the

¹ *St. Joseph Health Services of Rhode Island, Inc. v. St. Joseph Health Services of Rhode Island Retirement Plan*, C.A. No. PC-2017-3856 (the "Plan Receivership Proceedings").

Rhode Island Superior Court (the "State Court Action")² and the United States District Court for the District of Rhode Island (the "Federal Court Action")³ naming Petitioners and several other parties as defendants.

6. Petitioners entered into a Settlement Agreement with the Plan Plaintiffs dated as of August 31, 2018, (the "Settlement Agreement"). The Plan Receiver thereafter filed a Receiver's Petition for Settlement Instructions in the Receivership Proceedings seeking authorization to seek approval of the Settlement Agreement in the Federal Court Action. The Superior Court approved the Settlement Agreement and authorized the Plan Receiver to proceed in the Federal Court Action, by Order entered November 16, 2018. The Petitioners and the Plan Plaintiffs thereafter filed a Joint Motion for Settlement Class Certification, Appointment of Class Counsel, and Preliminary Settlement Approval, by Plaintiffs and Defendants St. Joseph Health Services of Rhode Island, Roger Williams Hospital, and CharterCARE Community Board, as well as multiple Replies to the objections to Final Settlement Approval. The Federal Court granted final approval of the Settlement Agreement by Memorandum and Order entered October 9, 2019.

7. The Petitioners have filed this Petition pursuant to the terms of the Settlement Agreement (§§ 1(s) & 21 of the Settlement Agreement require statutory liquidation and dissolution pursuant to R.I. Gen. Laws § 7-6-61) which was approved by both the Superior Court of Rhode Island and the U.S. District Court in and for the District of Rhode Island, seeking the appointment of a liquidating receiver pursuant to R.I. Gen. Laws § 7-6-61 (the "Liquidating Receiver").

8. On October 23, 2019, Petitioners transferred to the Plan Receiver cash and investments valued at \$12,595,644.45.⁴ Pursuant to the Settlement Agreement, the Petitioners retained \$600,000.00. As of the filing of this Petition, Petitioners have cash of \$584,849.94.

9. As required by the Settlement Agreement, Petitioners have transferred in the aggregate an additional \$84,949.43 to the Plan Receiver from moneys in excess of the \$600,000 referred to in paragraph 8.

10. Pursuant to the Settlement Agreement approved by the Superior Court and the Federal Court, the Petitioners are holding, in trust for the Plan Receiver, a membership interest of at least 15% in Prospect CharterCare, LLC, together with any other rights or interests that SJHSRI or RWH may have in connection therewith (the "Hospital Interests"). As the Hospital Interests are held in trust solely for the benefit of the Plan Receiver (§ 17

² *St. Joseph Health Services of Rhode Island Retirement Plan, et al. v. Prospect CharterCARE, LLC, et al.*, C.A. No. PC-2018-4386. The State Court Action has been stayed.

³ *Stephen Del Sesto, as Receiver and Administrator of the St. Joseph Health Services of Rhode Island Retirement Plan, et al. v. Prospect CharterCARE, LLC, et al.*, C.A. No. 1:18-CV-00328-WES-LDA.

⁴ Pursuant to the Settlement Agreement, Petitioners had previously delivered instruments transferring to the Receiver rights in other assets previously held by Petitioners.

of the Settlement Agreement), Petitioners request that the Liquidating Receiver be authorized and directed to be substituted and act as trustee of the Hospital Interests for the sole benefit of the Plan Receiver according and subject to the terms of the Settlement Agreement. Petitioners' obligations under the Settlement Agreement, including ¶ 24, shall continue.

11. In addition to the assets transferred to the Plan Receiver and those retained by the Petitioners pursuant to the Settlement Agreement, Roger Williams Hospital holds certain funds⁵ ("Special Purpose Funds") pursuant to paragraph 4 of Order of this Court entered on April 20, 2015 in the 2015 *Cy Pres* Proceeding (the "*Cy Pres* Order"). Pursuant to the *Cy Pres* Order, the Special Purpose Funds are to be used for (a) continuing medical education for the medical staff at Roger Williams Medical Center, and (b) to enhance surgical oncology physician and fellow training and education at Roger Williams Medical Center. The Plan Receiver has advised the Petitioners of his belief that the Special Purpose Funds are assets of Roger Williams Hospital that must be used to satisfy any remaining debts or claims against Roger Williams Hospital before they can be used for charitable purposes, and, therefore, should be disposed of in connection with the liquidation of Petitioners. However, Petitioners are unsure whether or not the Special Purpose Funds should be paid to the Plan Receiver. Accordingly, Petitioners request that the Special Purpose Funds be held by the Court or a fiduciary appointed by the Court, pending further order of this Court. The Plan Receiver has agreed to this, without prejudice to the Plan Receiver's right to file a motion directing that such funds be disposed of in connection with the liquidation or otherwise.

12. This Petition is made in good faith and in furtherance of the Petitioners' obligations under the Settlement Agreement.

13. A list of persons or entities believed by Petitioners potentially to have claims against the Petitioners is attached hereto as **Exhibit A**. Petitioners dispute some of these claims.

14. This Petition is filed to seek relief as prayed by virtue of and pursuant to R.I. Gen. Laws § 7-6-61.

WHEREFORE, Petitioners respectfully prays that this Honorable Court:

- (a) Enter the proposed Order which inter alia:
 - i. Appoints a Liquidating Receiver pursuant to R.I. Gen. Laws § 7-6-61 for the purpose of liquidating the Petitioners; and

⁵ Approximately \$160,400 remains as of the date hereof.

- ii. Enjoins all creditors of the Petitioners from asserting claims against or otherwise affecting the assets of Petitioners except by the filing of claims with the Liquidating Receiver in accordance with R.I. Gen. Laws § 7-6-63 and the orders of this Court; and
- iii. Directs the Liquidating Receiver to hold and administer the Hospital Interests in trust solely for the benefit of the Plan Receiver according to and subject to the terms of the Settlement Agreement; and
- iv. Orders that the Special Purpose Funds be held pending further order of this Court; and

(b) Grant Petitioners such other and further relief as this Court shall deem proper.

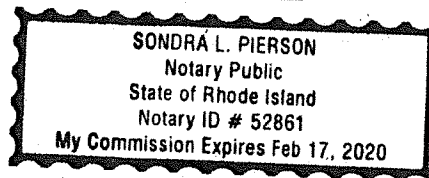


David Hirsch, Chairman
President of CharterCARE Community Board
President of St. Joseph Health Services of Rhode Island
President of Roger Williams Hospital

STATE OF RHODE ISLAND
COUNTY OF Providence


In Providence on the 12th day of December, 2019, before me personally appeared David Hirsch, who made oath that he subscribed to the foregoing Petition, that he knows the contents thereof and that the same are true, excepting those matters stated on information and belief, and as to those matters he believes them to be true.



Notary Public

CERTIFICATE OF ATTORNEY

I, the undersigned, Attorney for the Petitioner, certify that this Petition is made in good faith.



ROBERT D. FINE

EXHIBIT A

Potential Creditors

| Creditor | Creditor's Counsel | Counsel Address | Nature of Claim | Amount of Claim |
|--|-------------------------|---|--|-----------------|
| Prospect Medical Holdings, Inc. | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect East Holdings, | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare, L | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare Physicians, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare RWMC, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare SJHSRI, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare Elmhurst, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Any and all other Company/Prospect Indemnified Persons, as such term is defined in that certain Asset Purchase Agreement, dated as of September 24, 2013 | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Rhode Island Department of Environmental Management, et al (see attached list) | Ronald N. Gagnon, P.E. | RIDEM, 235 Promenade St., Providence, RI 02908-5767 | Environmental - TrukAway Landfill, Warwick, RI | Unliquidated |

| Creditor | Creditor's Counsel | Counsel Address | Case # (if applicable)/Claim # (if applicable)/Nature of Claim | Amount of Claim |
|------------------------------------|-------------------------|---|---|-----------------|
| Antoneta Grande | Coia & Lepore | 226 S Main St #1, Providence, RI 02903 | Claim #: 314581/Workers Compensation | Unliquidated |
| Karapet Emdjian | Karapet Emdjian | 575 Wickenden Street, Apt 812, Providence, 02903 | Claim #: 314593/Workers Compensation | Unliquidated |
| Maria Lindo | Gary Levine, Esq. | 56 Pine St #250, Providence, RI 02903 | Claim #: 314594/Workers Compensation | Unliquidated |
| Dianne McCray | Jack DeGiovanni | 989 Waterman Ave, East Providence, RI 02914 | Case #: 201701002/Claim #: 314597/Workers Compensation | Unliquidated |
| Mary Kay Hicks | John Harnett | 155 S Main St, Providence, RI 02903 | Case #: 201405590/Claim #: 314592/Workers Compensation | Unliquidated |
| Sheila Zoglio | Coia & Lepore | 226 S Main St #1, Providence, RI 02903 | Case #: 201205909/Claim #: 314579/Workers Compensation | Unliquidated |
| Jean Reynolds | John Harnett | 155 S Main St, Providence, RI 02903 | Claim #: 314628/Workers Compensation | Unliquidated |
| Jacqueline Durante | Zach Mandell, Esq. | Mandell, Schwartz & Boisclair, One Park Row, Providence, RI 02903 | Case #: PC-2013- 6568/Personal Injury (slip and fall) | Unliquidated |
| Richard Pacheco | Richard Brederson, Esq. | Brederson Law Center, 950 Smith Street, Providence, RI 02908 | Case #: PC-2016- 0058/Personal Injury (slip and fall) | Unliquidated |
| Wendy Marcello | Wendy Marcello | 524 Atwood Avenue, Apt. C, Cranston, RI 02920 | Case #: KC-2017- 0096/120708/Medical Malpractice | Unliquidated |
| Rosa Brito | Richard Pacia, Esq. | Joseph A. Voccola, Esq. and Associates, 454 Broadway, Providence, RI 02909 | Claim #: 75995E/Personal Injury (slip and fall) | Unliquidated |
| Ivan Toro | Lisa Cronin, Esq. | Orabona Law Offices, P.C., 129 Dorrance Street, Providence, RI 02903 | Case #: PC-2016- 4668/Claim #: 77544/Personal Injury (slip and fall) | Unliquidated |
| Prospect Medical Holdings, Inc. | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect East Holdings, Inc. | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |

| | | | | |
|---|-------------------------|---|---|--|
| Prospect CharterCare, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare Physicians, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare RWMC, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare SJHSRI, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare Elmhurst, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Any and all other Company/Prospect Indemnified Persons, as such term is defined in that certain Asset Purchase Agreement, dated as of September 24, 2013 | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Rhode Island Department of Environmental Management, et al (see attached list) | Ronald N. Gagnon, P.E. | RIDEM, 235 Promenade St., Providence, RI 02908-5767 | Environmental - TrukAway Landfill, Warwick, RI | Unliquidated |
| American Funds | | | Miscellaneous fully- funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Angell Pension Group | | | Miscellaneous fully- funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Fidelity Investments | | | Miscellaneous fully- funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Lincoln Financial Group | | | Miscellaneous fully- funded Retirement Plan | Potential wind-down expense (amount unknown) |

| | | | | |
|-------------------------------|--|--|--|--|
| Metlife/Brighthouse Financial | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Voya Financial | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |

| Creditor | Contact Information | Contact Address | Case #(s) (if applicable)/Claim #(s) (if applicable)/Nature of Claim | Amount of Claim |
|--------------------------|---|--|--|-----------------|
| Kellie Carney, et al | Amato DeLuca, Esq. | DeLuca & Weizenbaum, Ltd., 199 N. Main St, Providence, RI 02903 | Case #: PC-2009-0613/Claim #: 57767 & 58189/Medical Malpractice | Unliquidated |
| Dennis Giordano, et al | Doug Chabot, Esq. | Decof, Decof & Barry, One Smith Hill, Providence, RI 02903 | Case #: PC-2015-0633/Claim #: 785948E/Medical Malpractice | Unliquidated |
| Christina Mancini | Laura Harrington, Esq. | Harrington Law Group, PC, 4 Broadway, Newport, RI 02840 | Case #: PC-2017-0671/Claim #: 78533E/Medical Malpractice | Unliquidated |
| Judith O'Brien | Christopher E. Fay, Esq.; Andrew L. Alberino, III, Esq. | Fay Law Associates, 917 Reservoir Avenue, Cranston, RI 02910 | Case #: PC-2015-3869/Claim #: 73319E/Medical Malpractice | Unliquidated |
| Ana Polanco, et al | Timothy P. Lynch, Esq. | Marasco & Nesselbush LLP, 685 Westminster Street, Providence, RI 02903 | Case #: PC-2016-3629/Claim #: 76073E/Medical Malpractice | Unliquidated |
| Louis Scotti, et al | Kevin M. Daley, Esq. | Daley & Orton, 1383 Warwick Avenue, Warwick, RI 02888 | Case #: PC-2011-6871 (consolidated for discovery with PC-2013-1810)/Claim #: 68994/Medical Malpractice | Unliquidated |
| Pamela Tonsberg | David E. Maglio, Esq. | The Owen Building, 101 Dyer Street, 2nd Floor, Providence, RI 02903 | Case #: PC-2015-5258/Claim #: 76026E/Medical Malpractice | Unliquidated |
| Lisa Weber | Gregory Sorbello, Esq. | Peter Iascone & Associates, Ltd., 117 Bellevue Avenue, Newport, RI 02840 | Case #: PC-2016-4778/Claim #: 113607/Medical Malpractice | Unliquidated |
| Janice Battey, et al | Kevin Daley, Esq. | Daley & Orton, 1383 Warwick Avenue, Warwick, RI 02888 | Case #: PC-2015-1122/Claim #: 76466E/Medical Malpractice | Unliquidated |
| Stephanie Chenard, et al | Matthew Rocheleau, Esq. | Brosco & Brosco, 312 S. Main Street, No. 1, Providence, RI 02903 | Case #: PC-2016-4033/Claim #: 76981E/Medical Malpractice | Unliquidated |
| Elaine Donahue | Kevin Daley, Esq. | Daley & Orton, 1383 Warwick Avenue, Warwick, RI 02888 | Case #: PC-2016-3138/Claim #: 113786/Medical Malpractice | Unliquidated |
| Erin Dugas | Gil A. Bianchi Jr., Esq. | Bianchi & Brouillard PC, The Hanley Building, 55 Pine Street, Suite 250, Providence, RI 02903 | Case #: PC-2013-4644/Claim #: 76342E-01/Medical Malpractice | Unliquidated |

| | | | | |
|--|-----------------------------------|---|--|---------------|
| Maryann Narducci | James T. McCormick, Esq. | 536 Atwells Avenue, 2nd Floor, Providence, RI 02909 | Case #: PC-2015-4966/Claim #: 106990/Medical Malpractice | Unliquidated |
| Brian Dockray | James McCormick, Esq. | 536 Atwells Avenue, 2nd Floor, Providence, RI 02909 | Case #: PC-2015-4785/Claim #: 106988/Medical Malpractice | Unliquidated |
| Steven Axtell | Zach Mandell, Esq. | Mandell, Schwartz & Boisclair, One Park Row, Providence, RI 02903 | Case #: PC-2017-4130/Claim #: 108475/Medical Malpractice | Unliquidated |
| Michael Nissensohn, M.D | Gregory Tumolo; Ronald J. Resmini | 10 Dorrance St #400, Providence, RI 02903; 155 S Main St #400, Providence, RI 02903 | Case #: PC-2012-6232/Wrongful Termination | Unliquidated |
| Prospect Medical Holdings, Inc. | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect East Holdings, Inc. | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
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| Prospect CharterCare SJHSRI, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Prospect CharterCare Elmhurst, LLC | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Any and all other Company/Prospect Indemnified Persons, as such term is defined in that certain Asset Purchase Agreement, dated as of September 24, 2013 | Gary W. Herschman, Esq. | Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attention: Gary W. Herschman, Esq. | Indemnification | Unliquidated |
| Rhode Island Department of Environmental Management, et al (see attached list) | Ronald N. Gagnon, P.E. | RIDEM, 235 Promenade St., Providence, RI 02908-5767 | Environmental - TrukAway Landfill, Warwick, RI | Unliquidated |
| Roger Williams Medical Center | Moshe Berman, Esq. | 825 Chalkstone Ave., Providence, RI 02908 | "Special Purposes" Fund per Cy Pres Petition/Order | \$ 209,433.79 |

| | | | | |
|---|--|--|--|--|
| American Funds | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Fidelity Investments | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Metlife/Brighthouse Financial | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Minnesota Life Insurance Company/Securian Financial | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| TIAA-CREF | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| VALIC (AIG) | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |
| Voya Financial | | | Miscellaneous fully-funded Retirement Plan | Potential wind-down expense (amount unknown) |

Angell Pension Group
88 Boyd Avenue
East Providence, RI 02914

Beacon Mutual
BMIC Service Co.
One Beacon Centre
Warwick, RI 02886

Cervenka Green & Ducharme, LLC
235 Promenade Street, Ste 475
Providence, RI 02908

ECG Management Consultants
PO Box 74008176
Chicago, IL 60674-8176

Evidox Corporation
aka QDiscovery
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Suite 140
New London, CT 06320

ExamWorks Clinical Solutions
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Lawrenceville, GA 30043

Kahn Litwin Renza & Co., Ltd.
951 North Main Street
Providence, RI 02904

Littler Mendelson PC
One International Place Ste 2700
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Chicago, IL 60680-9366

Premier Legal Support Services
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Providence, RI 02909

Southwest Consulting Associates
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Plano, TX 75093-8724

Verrill Dana LLP
One Boston Place, Ste 1800
Boston, MA 02018

Truk-Away PRP List
See Attached

Truk-Away Contact List

Potentially Responsible Party

State of Rhode Island Department of Administration

Contact: Michael DiBiase and Jennifer Sternick

Address: RI DOA, Division of Legal Services
One Capitol Hill, 4th Floor
Providence, RI 02908

Phone: 401-222-2280

Email: Jennifer.Sternick@doa.ri.gov

Rhode Island Department of Transportation

Contact: Peter Alviti, Jr., P.E.

Address: RI DOT
Two Capitol Hill
Providence, RI 02908

Phone:

Email:

BASF aka Ciba Geigy Corporation

Contact: Joseph Guarnaccia, Phd

Address: 100 Park Avenue
Florham Park, NJ 07932

Phone:

Email:

Bird Incorporated

Contact: Tom Smith

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Phone:

Email:

Care New England

Contact: David Duncan

Address: 45 Willard Avenue
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Phone: 401-430-3806

Email: dduncan@carene.org

Counsel

Counsel: Michael P. Donegan, Esq. and Giovanni
La Terra Bellina, Esq.

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144 Wayland Avenue
Providence, RI 02906

Phone: 401-223-2100

email: mdonegan@orsonandbrusini.com;
jlaterra@orsonandbrusini.com

Counsel: John J. Igliazzi, Esq.

Address: RI DOT
Two Capitol Hill
Providence, RI 02908

Phone: 401-222-2450

email: john.iglozzi@dot.ri.gov

Counsel: Katie Gannon, Esq. and David Schneider, Esq.

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Florham Park, NJ 07932

Phone:

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DSchneider@bressler.com

Counsel: Brett Slensky, Esq.

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Counsel: Robin Main, Esq.

Address: Hinckley, Allen & Snyder LLP
100 Westminster St., Ste. 1500
Providence, RI 02903

Phone: 401-274-2000

Email: rmain@hinckleyallen.com

Truk-Away Contact List

Potentially Responsible Party

Celanese America, Inc. aka American Hoechst

Contact: Michael Simpson
Address: 222 W. Las Colinas Blvd., Ste. 900N
Irving, TX 75039

Phone: 972-443 3723
Email: Michael.Simpson@celanese.com

CharterCARE Health Partners

Contact: John J. Holiver
Address: 825 Chalkstone Avenue
Providence, RI 02908

Phone:
Email:

City of Newport

Contact: Joseph Nicholson, Jr.
Address: City Hall, 2nd Floor
43 Broadway
Newport, RI 02840

Phone:
Email:

City of Warwick

Contact: Mayor Scott Avedesian
Address: Warwick City Hall
3275 Post Road
Warwick, RI 02886

Phone:
Email:

Leesona

Contact: Robert C. Clark
Address: 2727 Tucker Street Extension
Burlington, NC 27215

Phone:
Email:

Counsel

Counsel: David Graham, Esq.
Address: Kaufman & Canoles
4801 Courthosue Street, Ste. 300
Williamsburg, VA 23188
Phone: 757-259-3855
Email: dbgraham@kaufcan.com

Counsel: Alan Shoer, Esq.
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Solicitor: Christopher J. Behan, Esq.
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43 Broadway
Newport, RI 02840
Phone: 401-845-5421
Email: cbehan@cityofnewport.com

Counsel: Marisa Desautel, Esq.
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Counsel: Peter D. Ruggiero, Esq.
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Counsel: Kevin G. Williams, Esq.
Address: Bell, Davids & Pitt, P.A.
100 N Cherry St, Suite 600
Winston-Salem, NC 27101
Phone: 336-714-4150
Email: kwilliams@belldavisritt.com

Truk-Away Contact List

Potentially Responsible Party

Lifespan

Contact: Timothy Babineau
Address: 167 Point Street
Providence, RI 02903

Phone:
Email:

Memorial Hospital of RI

Contact: David Duncan
Address: 45 Willard Avenue
Providence, RI 02905

Phone: 401-430-3806
Email: dduncan@carene.org

Octeau Brothers Company

Contact: Donald A. Octeau
Address: 111 Jenckes Hill Road
Lincoln, RI 02865

Phone:
Email:

Prospect Medical Holdings

Contact: Samuel Lee
Address: 3415 South Sepulveda Blvd., 9th Floor
Los Angeles, CA 90034

Phone:
Email:

Rhode Island Hospital

Contact: Margaret M. Van Bree
Address: Rhode Island Hospital
593 Eddy Street
Providence, RI 02903

Phone:
Email:

RI Condominium Association, Inc.

Contact: Robert Green and Laurie Timmons
Address: co TKG Rhode Island Mall
211 N. Stadium Blvd., Suite 201
Columbia, MO 65203
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