

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

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St. Joseph Health Services of Rhode  
Island, Inc.

Vs.

PC 2017-3856

St. Josephs Health Services of Rhode  
Island Retirement Plan, as amended

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**ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND'S  
SEVENTH SUPPLEMENTAL RESPONSE TO SUBPOENA**

Pursuant to the Rhode Island Superior Court Rules of Civil Procedure, St. Joseph Health Services of Rhode Island (“SJHSRI”), by and through its undersigned counsel, hereby responds as follows to the Subpoena served on it by Max Wistow, Esq. (“Wistow”) as special counsel to the Receiver of the St. Joseph Health Services of Rhode Island Retirement Plan.

SJHSRI reserves its objection<sup>1</sup> as to the production of documents that are protected from disclosure by the work-product doctrine, attorney-client privilege or any other applicable privilege, and is producing without waiving such objection and subject to the Rhode Island Superior Court Rules of Civil Procedure, specifically Super. Ct. R. Civ. P. 26 as it relates to electronically stored information and Supreme Court Rules, Article X, Rule 8 Non-Public Filings.

SJHSRI will supplement its production of documents when, as, and if further

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<sup>1</sup> SJHSRI reserves its objection to the introduction into evidence of any documents obtained by Wistow through this subpoena (or any other subpoena issued by Wistow in the above-captioned case) in any other proceeding.

responsive documents are identified, and any supplemental production shall be made upon the same terms and objections.

Requests 1 through 61:

**Response:** Without waiving objection, see **Exhibit 1** which contains an index of documents with bates-stamp number, custodian, and which identifies each request to which the documents pertain.

St. Joseph Health Services of Rhode Island,

By its attorneys,

/s/ George E. Lieberman

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Dated: April 26, 2018

## CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2018, I caused to be served a true copy of the within document through the Rhode Island Judiciary's electronic filing system on the following parties. The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

Max Wistow, Esq.  
Wistow, Sheehan & Loveley, PC  
61 Weybosset Street  
Providence, RI 02903

/s/ George E. Lieberman

**EXHIBIT 1**

<b>Prod BegBates</b>	<b>Prod EndBates</b>	<b>Custodian</b>	<b>Categories</b>
SJHSRI-304585	SJHSRI-304587	Prospect	7-11; 22
SJHSRI-304588	SJHSRI-304593	Prospect	28; 29
SJHSRI-304594	SJHSRI-304595	Prospect	7-11
SJHSRI-304596	SJHSRI-304603	Prospect	7-11
SJHSRI-304604	SJHSRI-304606	Prospect	7-11
SJHSRI-304607	SJHSRI-304610	Prospect	7-11
SJHSRI-304611	SJHSRI-304612	Prospect	7-11
SJHSRI-304613	SJHSRI-304615	Prospect	1-6; 41; 42
SJHSRI-304616	SJHSRI-304617	Prospect	34; 35
SJHSRI-304618	SJHSRI-304619	Prospect	37; 38; 44; 50; 51
SJHSRI-304620	SJHSRI-304647	Prospect	1-6; 41; 42
SJHSRI-304648	SJHSRI-304852	Prospect	1-6; 41; 42
SJHSRI-304853	SJHSRI-304865	Prospect	30; 31
SJHSRI-304866	SJHSRI-304970	Prospect	15; 17; 19; 37; 38; 44; 50; 51
SJHSRI-304971	SJHSRI-304992	Prospect	25; 26
SJHSRI-304993	SJHSRI-305035	Prospect	7-11; 25; 26
SJHSRI-305036	SJHSRI-305091	Prospect	1-6; 41; 42;15; 28; 29
SJHSRI-305092	SJHSRI-305116	Prospect	15; 28; 29
SJHSRI-305117	SJHSRI-305136	Prospect	1-6; 41; 42;15; 28; 29
SJHSRI-305137	SJHSRI-305167	Prospect	1-6; 41; 42; 28; 29
SJHSRI-305168	SJHSRI-305184	Prospect	1-6; 41; 42; 14; 18; 52
SJHSRI-305185	SJHSRI-305188	CRF	22
SJHSRI-305189	SJHSRI-305190	CRF	34; 35
SJHSRI-305191	SJHSRI-305252	CRF	1-6; 41; 42; 34; 35
SJHSRI-305253	SJHSRI-305254	CRF	1-6; 41; 42
SJHSRI-305255	SJHSRI-305274	CRF	1-6; 41; 42; 14; 18; 52; 37; 38; 44; 50; 51