

**HEARING DATE: July 30, 2020 at 10:00 a.m. before Judge Stern**

STATE OF RHODE ISLAND  
PROVIDENCE, S.C.

SUPERIOR COURT

IN RE: CHARTERCARE COMMUNITY :  
BOARD, ST. JOSEPH HEALTH SERVICES :  
OF RHODE ISLAND, and ROGER : P.C. 2019-11756  
WILLIAMS HOSPITAL. :

**OBJECTION OF ADLER POLLOCK & SHEEHAN P.C.  
AND PROSPECT MEDICAL HOLDINGS, INC. (AND ITS  
AFFILIATED ENTITIES) TO MOTION FOR INJUNCTIVE RELIEF**

Adler Pollock & Sheehan P.C. and Prospect Medical Holdings, Inc. (and its affiliated entities)<sup>1</sup> hereby object to the Liquidating Receiver and Plan Receiver's Motion for Injunctive Relief Against Adler Pollock & Sheehan P.C. (the "Motion"). This Objection is based on the accompanying Memorandum of Law. As set forth therein, the Court must deny the Motion.

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<sup>1</sup> Prospect Medical Holdings, Inc.'s affiliated entities are Chamber Inc., Ivy Holdings Inc., Ivy Intermediate Holding Inc., Prospect East Holdings, Inc., Prospect East Hospital Advisory Services, LLC, Prospect CharterCARE, LLC, Prospect CharterCARE SJHSRI, LLC, Prospect CharterCARE RWMC, LLC, Prospect Blackstone Valley Surgicare, LLC, and Prospect CharterCARE Home Health and Hospice, LLC.

Respectfully submitted,

ADLER POLLOCK & SHEEHAN P.C.,  
PROSPECT MEDICAL HOLDINGS, INC. AND ITS AFFILIATED ENTITIES<sup>2</sup>

By their attorneys:

/s/ John A. Tarantino

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July 27, 2020

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<sup>2</sup> Chamber Inc., Ivy Holdings Inc., Ivy Intermediate Holding Inc., Prospect East Holdings, Inc., Prospect East Hospital Advisory Services, LLC, Prospect CharterCARE, LLC, Prospect CharterCARE SJHSRI, LLC, Prospect CharterCARE RWMC, LLC, Prospect Blackstone Valley Surgicare, LLC, and Prospect CharterCARE Home Health and Hospice, LLC.

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2020:

I electronically served this document through the electronic filing system on the following parties:

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/s/ John A. Tarantino