Case Number: PC-2019-11756
Filed in Providence/Bristol County Superior Court

Submitted: 7/10/2020 1:06 PM

Envelope: 2658896 Reviewer: Rachel L.

STATE OF RHODE ISLAND PROVIDENCE, SC.

SUPERIOR COURT

In re:

CharterCARE Community Board,

St. Joseph Health Services of Rhode Island,

:

And

Roger Williams Hospital

PC-2019-11756

LIQUIDATING RECEIVER AND PLAN RECEIVER'S MOTION FOR INJUNCTIVE RELIEF AGAINST ADLER POLLOCK & SHEEHAN, PC

Thomas S. Hemmendinger as Liquidating Receiver of CharterCARE Community Board, St. Joseph Health Services of Rhode Island, and Roger Williams Hospital, and Stephen Del Sesto as Receiver of the St. Joseph Health Services of Rhode Island Retirement Plan, hereby move for an order enjoining Adler Pollock & Sheehan PC and its attorneys from (a) representing the Prospect Entities in matters relating to the Change in Effective Control proceedings pending before the Rhode Island Department of Health and the Hospital Conversion Act proceedings pending before the Attorney General; and from (b) sharing their knowledge or work product with the Prospect Entities or successor counsel.

Movants rely upon the memorandum of law being submitted herewith.

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## Respectfully submitted,

Thomas S. Hemmendinger, as Liquidating Receiver of CharterCARE Community Board, St. Joseph Health Services of Rhode Island, and Roger Williams Hospital

## /s/ Thomas S. Hemmendinger

Thomas S. Hemmendinger, Esq. (#3122) Brennan, Recupero, Cascione, Scungio & McAllister, LLP 362 Broadway Providence, RI 02909 Tel. (401) 453-2300 Fax (401) 453-2345 themmendinger@brcsm.com

Stephen Del Sesto as Receiver of the St. Joseph Health Services of Rhode Island Retirement Plan, By his Attorney,

## /s/ Max Wistow

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Dated: July 10, 2020

Case Number: PC-2019-11756

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## **CERTIFICATE OF SERVICE**

I hereby certify that, on the 10th day of July, 2020, I filed and served the foregoing document through the electronic filing system on the following users of record:

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The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Benjamin Ledsham