

**HEARING DATE: MARCH 6, 2020; JUDGE STERN @ 9:30AM**

STATE OF RHODE ISLAND  
PROVIDENCE, SC

SUPERIOR COURT

CHARTERCARE COMMUNITY BOARD

VS.

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C.A. NO. PC-2019-3654

SAMUEL LEE, ET AL.

**PROSPECT CHARTERCARE, LLC, PROSPECT MEDICAL HOLDINGS, INC.,  
PROSPECT EAST HOLDINGS, INC., AND  
PROSPECT EAST HOSPITAL ADVISORY SERVICES, LLC'S  
OBJECTION TO PLAN RECEIVER AND LIQUIDATING RECEIVER'S  
MOTION TO COMPEL**

NOW COMES Prospect Chartercare, LLC ("PCC"), Prospect Medical Holdings, Inc., Prospect East Holdings, Inc., and Prospect East Hospital Advisory Services, LLC (the "Prospect Entities") and hereby file their objection to the Plan Receiver and Liquidating Receiver's Motion to Compel Production of Documents and Other Information From Prospect CharterCare, LLC. In support of this Objection, the Prospect Entities submit their Memorandum in Support hereof, and Affidavit of Preston W. Halperin.

Respectfully Submitted,

PROSPECT CHARTERCARE, LLC,

/s/ W. Mark Russo

W. Mark Russo (#3937)

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PROSPECT MEDICAL HOLDINGS, INC.,  
PROSPECT EAST HOLDINGS, INC., AND  
PROSPECT EAST HOSPITAL ADVISORY  
SERVICES, LLC

By its Attorneys,

/s/ Preston W. Halperin  
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Dated: March 3, 2020

**Certificate of Service**

I certify that on the 3<sup>rd</sup> day of March 2020, the within document was electronically filed and electronically served through the Rhode Island Judiciary Electronic Filing System, on all counsel of record and those parties registered to receive electronic service in this matter. The document is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/Preston W. Halperin