

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

ST. JOSEPH HEALTH SERVICES OF :
RHODE ISLAND, INC. :

vs. :

C.A. No: PC-2017-3856

ST. JOSEPHS HEALTH SERVICES OF :
RHODE ISLAND RETIREMENT PLAN, :
as amended :

**RESPONDENT’S OBJECTION TO THE ATTORNEY GENERAL’S “EMERGENCY”
MOTION AND CROSS MOTION TO SET SPECIFIC DATES FOR ROLLING
PRODUCTION**

Special Counsel hereby objects to the Attorney General’s “emergency” motion to establish a second claw-back procedure in contravention of the provisions contained in the Confidentiality Order to which Special Counsel and the Attorney General’s office previously agreed and previously filed with the Court. Special Counsel also submits a cross motion to set specific dates for rolling production, pursuant to the allowance set forth in paragraph 7 of the Order compelling production entered on December 7, 2017, for Special Counsel to seek “further relief” if “Special Counsel believes that there is a failure of good faith compliance with the rolling production.” Special Counsel submits its memorandum of law in support of this objection and cross motion.

Respondent,
The Receivership Estate
By its Attorneys,

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Dated: December 15, 2017

CERTIFICATE OF SERVICE

I hereby certify that, on the 15th day of December, 2017, I filed and served the foregoing document through the electronic filing system on the following users of record:

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