

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 MOTION TO COMPEL DOCUMENTS FROM ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND AND FOR MONETARY SANCTIONS

The Respondent hereby moves for an order overruling St. Joseph Health Services of Rhode island's objections to two subpoenae duces tecum, compelling compliance therewith, and scheduling a hearing concerning the imposition of sanctions for bad faith failure to make discovery. In support of this motion the Respondent submits its memorandum of law.

Respondent,
The Receivership Estate
By its Attorneys,

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Dated: December 20, 2017

CERTIFICATE OF SERVICE

I hereby certify that, on the 20th 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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