

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PROVIDENCE, sc.

SUPERIOR COURT

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

v.

No. PC-2017-3856

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

STATUS UPDATE CONCERNING THE ROMAN CATHOLIC BISHOP OF PROVIDENCE, A CORPORATION SOLE'S RESPONSE TO SUBPOENA

The Roman Catholic Bishop of Providence, a corporation sole ("RCB"), files this status report regarding its response to the November 2, 2017 subpoena ("Subpoena") served by special counsel to the court-appointed receiver ("Special Counsel") in the above-referenced proceedings.

1. On December 22, 2017, RCB made a third production in response to the Subpoena of an additional 215 pages. This production consisted of (a) privileged documents that RCB determined could be produced with redactions; (b) specific documents discussed during RCB and Special Counsel's December 8 meet and confer; and (c) documents produced in light of discussions during the meet and confer process.

2. On December 14, 2017, RCB circulated a proposed stipulation and protective order ("Protective Order") to Special Counsel for its review and comment in connection with the production of the Election of Benefits forms referenced in RCB's first status update. On December 22, 2017, Special Counsel replied with comments on the Protective Order.

3. RCB responded to Special Counsel on December 26, 2017 with a revised version of the Protective Order aimed at addressing Special Counsel's comments. RCB advised that it had identified a small number of responsive documents that contained personal identifying information (e.g. social

security numbers) of pension beneficiaries that were not Election of Benefits forms. RCB requested that the Protective Order not be limited to the Election of Benefits forms, but be broad enough to cover other responsive documents that contained personal identifying information of pension beneficiaries. RCB awaits Special Counsel's response on the revised Protective Order.

4. In the interim, RCB has had the Election of Benefits forms scanned and made ready for production and will produce them promptly, along with the other responsive documents containing the personal identifying information of pension beneficiaries referenced above, following the entry of a mutually acceptable Protective Order.

5. RCB will continue to work with Special Counsel in an effort to resolve any issues that may arise in a cooperative manner and without the need for the Court's intervention.

Respectfully Submitted,

**NON-PARTY ROMAN CATHOLIC
BISHOP OF PROVIDENCE, A
CORPORATION SOLE**

By its attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/ Howard Merten

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Date: December 26, 2017

CERTIFICATE OF SERVICE

I hereby certify that, on the 26th day of December, 2017:

I filed and served this document through the electronic filing system on all parties registered therein to receive notice in this case.

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