

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 14, 2017, RCB circulated to Special Counsel for its review and comment a proposed stipulation and protective order ("Protective Order") directed to the production of the Election of Benefits forms referenced in RCB's first status update.

2. After a series of consultations, the parties have agreed to the terms of the Protective Order. RCB has sent the final version of the Protective Order to Special Counsel and requested that Special Counsel provide the requisite signature/authorization under Rule 7(e) of the Supreme Court Rules Governing Electronic Filing, so that RCB may proceed with filing the Protective Order for entry.

3. As discussed in a prior status update, RCB has had the Election of Benefits forms scanned and made ready for production and will produce them promptly, along with certain other responsive documents containing the personal identifying information of pension beneficiaries, following the entry of the Protective Order.

4. RCB also harvested a small collection of additional documents in response to meet and confer discussions with Special Counsel and will conduct a review of those documents and produce any responsive, non-privileged documents by the next status report.

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: January 2, 2018

CERTIFICATE OF SERVICE

I hereby certify that, on the 2nd day of January, 2018:

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

/s/ Howard Merten _____