

**STATE OF RHODE ISLAND  
PROVIDENCE, SC.**

**SUPERIOR COURT**

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St. Joseph Health Services of Rhode  
Island, Inc.

vs.

PC 2017-3856

St. Joseph Health Services of Rhode  
Island Retirement Plan, as amended

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**ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND, INC.'S SUPPLEMENT TO  
ITS OBJECTION TO SPECIAL COUNSEL'S MOTION TO COMPEL**

St. Joseph Health Services of Rhode Island, Inc. ("SJHSRI") files this Supplement<sup>1</sup> in further support of its Objection to Special Counsel's Motion to Compel.

SJHSRI submits as follows:

**I. OVERVIEW**

SJHSRI believes that it has identified the universe of documents potentially responsive to the subpoena dated October 18, 2017 (return date November 8, 2017) ("First Subpoena") and has worked to gather those documents to which SJHSRI has access. As previously set forth in its Memorandum of Law, SJHSRI produced to SC documents (i) bates-stamped SJHSRI1 to SJHSRI4606 on November 8, 2017, (ii) bates-stamped SJHSRI4607 to SJHSRI4726 on November 9, 2017, and (iii) bates-stamped SJHSRI4727 to SJHSRI4746 on December 12, 2017.

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<sup>1</sup> SJHSRI files this Supplement at the request of the Court and has responded to the Court's enumerated inquiries as to each of Max Wistow's ("SC") 61 requests. Nothing contained herein shall be considered a waiver of any of SJHSRI's rights, privileges or objections, all of which are expressly reserved.

SJHSRI has gathered and bates-stamped approximately 44,000 additional pages of documents, including SJHSRI's paper records (37,000 pages) ("Corporate Records")<sup>2</sup> and a majority of SJHSRI's electronic records (7,000 pages) ("Electronic Records"), in its possession, custody or control. SJHSRI is still in the process of reviewing approximately 1,425 additional Electronic Records.

SJHSRI is prepared to produce the Corporate Records and the reviewed and bates-stamped Electronic Records subject to a protective order providing for a claw-back of privileged or confidential documents. A copy of a proposed protective order is attached to SJHSRI's Memorandum of Law as Exhibit 8.

As explained to SC, SJHSRI is aware of his desire for prompt production. The time needed to review the 37,000 pages of Corporate Records for privilege and confidentiality would be a non-factor if a protective order were entered.

With respect to the Electronic Records, SJHSRI (1) has already reviewed approximately 7,000 pages for privilege and confidentiality and has bates-stamped them for production, (2) is in the process of reviewing the remaining 1,628 documents, of which 203 have been reviewed for privilege and confidentiality, and (3) intends to provide a privilege log to SC upon completion of its review of all the Electronic Records.

As explained in SJHSRI's Memorandum of Law, there are 34 boxes of paper records owned by and in the possession, custody, and control of Prospect CharterCare,

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<sup>2</sup> There are 10 additional boxes that are corporate records that have not been scanned, reviewed or bates-stamped. SJHSRI's e-discovery vendor is in the process of scanning these last 10 boxes.

LLC (“Prospect”) which may contain documents responsive to the First Subpoena (“Prospect Records”). However, because Prospect was subpoenaed by SC, SJHSRI no longer has any access to the Prospect Records.<sup>3</sup> SJHSRI has proposed to produce the Prospect Records to SC without any review for privilege or confidentiality (but subject to a protective order) if and when SJHSRI is permitted access to the Prospect Records. Furthermore, SJHSRI believes that documents responsive to the requests are within Prospect’s electronic records and computer systems, which SJHSRI does not own or have any access.

To be clear, while SJHSRI does not have any obligation to produce the Prospect Records owned by Prospect, SJHSRI has engaged in good faith efforts to facilitate access to those records. Before the Prospect subpoena was issued, SJHSRI was in process of preparing to produce those Prospect Records to which it was granted access (subject to Prospect’s reservation of rights) to SC. SJHSRI requested the documents, met with Prospect employees, did a review of the boxes to preliminarily identify them, arranged for them to be brought to an e-discovery vendor, and had them placed in queue for scanning. Before they were scanned, the Prospect subpoena was issued and

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<sup>3</sup> Despite SC’s protestations otherwise, Prospect owns the Prospect records pursuant to the terms of the Asset Purchase Agreement. SJHSRI only retained ownership of the Corporate Records and has set forth its proposal for production of such Corporate Records subject to a protective order.

SJHSRI's access was terminated. Thus, SJHSRI is not in possession, custody or control of the Prospect Records (owned by Prospect) and now has no ability to produce them.<sup>4</sup>

In consideration of the general circumstances above, SJHSRI responds to the Court's January 2, 2017 inquiry as follows:

## II. ENUMERATED RESPONSES BY DOCUMENT REQUEST

### 1) ALL DOCUMENTS CONCERNING THE STATUS OR QUALIFICATION VEL NON OF THE PLAN AS A CHURCH PLAN, INCLUDING BUT NOT LIMITED TO ALL LEGAL OPINION LETTERS THAT MAY BE REFERENCED IN PARAGRAPH 7 OF THE VERIFIED PETITION;

#### 1. *Have the documents for this category been identified?*

SJHSRI believes that it has identified and produced many of the documents responsive to this request, including four legal opinion letters.<sup>5</sup> Such belief is qualified, however, because SJHSRI has not reviewed the 37,000 pages of Corporate Records, completed its review of the Electronic Records, or reviewed the 34 boxes of Prospect Records.

#### 2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and Electronic Records in its possession that may include documents responsive to this request. SJHSRI continues its review of the Electronic Records.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

#### 3. *Have the documents for this category been scanned and bates stamped?*

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<sup>4</sup> Where SJHSRI states that it believes that Prospect is in possession of potentially responsive documents in each of the enumerated responses below, SJHSRI incorporates the explanation "Section I. Overview" in each such response.

<sup>5</sup> In each instance where SJHSRI states that it believes documents have been identified, such belief is qualified by the fact that SJHSRI has not reviewed the 37,000 pages of Corporate Records, completed its review of the Electronic Records, or reviewed the 34 boxes of Prospect Records.

SJHSRI produced documents bates-stamped SJHSRI1 to SJHSRI19 in response to this request. The Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. Of the Electronic Records, SJHSRI is prepared to produce documents bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order. SJHSRI does not know if the Prospect Records have been scanned or bates-stamped.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the 1,628 Electronic Documents in its possession, custody or control that have not already been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1 to SJHSRI19 in response to this request. SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1 to SJHSRI19 in response to this request.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

2) **ALL DOCUMENTS CONCERNING THE PLAN, INCLUDING ANY PLAN DOCUMENTS, REPORTS, AND ACTUARIAL VALUATIONS;**

1. *Have the documents for this category been identified?*

It is impossible for SJHSRI to identify “all documents concerning the Plan,” and the Court should instruct SC to refine this overly broad request. Nonetheless, SJHSRI believes that it has identified and produced many of the documents responsive to this request, including actuarial reports for 2014-2016, three plan amendments, bank statements, and the 1995 trust agreement. Such belief is qualified, however, because SJHSRI has not reviewed the 37,000 pages of Corporate Records, completed its review of the Electronic Records, or reviewed the 34 boxes of Prospect Records.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped. SJHSRI does not know if the Prospect Records have been scanned or bates-stamped.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege. SJHSRI has not completed a review of the Corporate Records or 1,425 of the Electronic records.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will

produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1 to SJHSRI4746 in response to this request. SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1 to SJHSRI4746.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.



**3) ALL TRUST AGREEMENTS, OR MODIFICATIONS OF TRUST AGREEMENTS, RELATING TO THE PLAN;**

*1. Have the documents for this category been identified?*

SJHSRI believes that it has identified and produced many of the documents responsive to this request, including the 1995 trust agreement and three amendments.

*2. Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

*3. Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped. SJHSRI does not know if the Prospect Records have been scanned or bates-stamped.

*4. Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

*5. Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI306 to SJHSRI321 in response to this request. SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI306 to SJHSRI320.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

4) **ALL DOCUMENTS RELATING TO AUTHORIZATIONS REGARDING PURCHASES OR SALES FOR ACCOUNTS HELD BY OR RELATING TO THE PLAN;**

1. *Have the documents for this category been identified?*

SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI's Corporate Records. Second, SJHSRI has identified some documents potentially responsive to this request within its Electronic Records, including Bank of America statements, Angell Pension reports, and Mercer Investment statements. Third, potentially responsive documents are in the possession, custody or control of the Receiver.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Since the inception of the Receivership, the Receiver has been in possession, custody and control of documents potentially responsive to this request by virtue of his authority to direct Mercer Investments, Bank of America and Angell Pension to provide such records to him. SJHSRI does not have any obligation to pursue records already in the Receiver's possession, custody or control.

Notwithstanding the above response, with respect to (i) authorizations for purchases or sales prior to December 2014, SJHSRI has 37,000 pages of Corporate Records in its possession that may include documents responsive to this request, and (ii) authorizations for purchases or sales after December 2014, SJHSRI has produced bank statements from October 2013 to August 2017, actuarial reports from 2014 to 2016, meeting minutes, committee meeting minutes, and resolutions. SJHSRI continues its review of the Electronic Records for additional responsive documents.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602 in response to this request. SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

5) ALL DOCUMENTS RELATING TO INVESTMENTS OR RECOMMENDATIONS CONCERNING THE ASSETS OF THE PLAN;

1. *Have the documents for this category been identified?*

SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI's Corporate Records. Second, SJHSRI has identified some documents potentially responsive to this request within its Electronic Records, including Bank of America statements, Angell Pension reports, and Mercer Investment statements. Third, potentially responsive documents are in the possession, custody or control of the Receiver.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Since the inception of the Receivership, the Receiver has been in possession, custody and control of documents potentially responsive to this request by virtue of his authority to direct Mercer Investments, Bank of America and Angell Pension to provide such records to him. SJHSRI does not have any obligation to pursue records already in the Receiver's possession, custody or control.

Notwithstanding the above response, with respect to (i) authorizations for purchases or sales prior to December 2014, SJHSRI has 37,000 pages of Corporate Records in its possession that may include documents responsive to this request, and (ii) authorizations for purchases or sales after December 2014, SJHSRI has produced bank statements from October 2013 to August 2017, actuarial reports from 2014 to 2016, meeting minutes, committee meeting minutes, and resolutions. SJHSRI continues its review of the Electronic Records for additional responsive documents.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602 in response to this request. SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

**6) ALL RECORDS OF TRANSACTIONS SINCE JANUARY 1, 2003  
FOR ASSETS OR ACCOUNTS REFERENCED IN REQUEST #4  
ABOVE;**

*1. Have the documents for this category been identified?*

SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI's Corporate Records. Second, SJHSRI has identified some documents potentially responsive to this request within its Electronic Records, including Bank of America statements, Angell Pension reports, and Mercer Investment statements. Third, potentially responsive documents are in the possession, custody or control of the Receiver.

*2. Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Since the inception of the Receivership, the Receiver has been in possession, custody and control of documents potentially responsive to this request by virtue of his authority to direct Mercer Investments, Bank of America and Angell Pension to provide such records to him. SJHSRI does not have any obligation to pursue records already in the Receiver's possession, custody or control.

Notwithstanding the above response, with respect to (i) authorizations for purchases or sales prior to December 2014, SJHSRI has 37,000 pages of Corporate Records in its possession that may include documents responsive to this request, and (ii) authorizations for purchases or sales after December 2014, SJHSRI has produced bank statements from October 2013 to August 2017, actuarial reports from 2014 to 2016, meeting minutes, committee meeting minutes, and resolutions. SJHSRI continues its review of the Electronic Records.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

*3. Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped.

*4. Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602 in response to this request. SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.



7) ALL DOCUMENTS RELATING TO IDENTIFICATION OR ENUMERATION OF TRUSTEES, OR THEIR APPOINTMENTS, TENURES, RESIGNATIONS, OR TERMINATIONS, AND ALL AUTHORIZATIONS OF TRUSTEES RELATING TO ASSETS OR ACCOUNTS REFERENCED IN REQUEST #4 ABOVE;

1. *Have the documents for this category been identified?*

SJHSRI believes documents responsive to this request are within SJHSRI's Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including meeting minutes, resolutions, a member directory and resignations of board members.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

8) **ALL DOCUMENTS RELATING TO THE ESTABLISHMENT, FUNCTIONS, OR CONDUCT OF ANY BOARD, COMMITTEE, OR SUBCOMMITTEE THAT ADMINISTERS OR ADMINISTERED THE PLAN, INCLUDING ANY BOARD OR COMMITTEE OR SUBCOMMITTEE RESOLUTIONS AND ANY APPOINTMENTS TO SUCH BOARD, COMMITTEE, OR SUBCOMMITTEE;**

1. *Have the documents for this category been identified?*

SJHSRI believes documents responsive to this request are within SJHSRI's Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including meeting minutes, resolutions, a member directory and resignations of board members.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

9) **ALL DOCUMENTS RELATING TO MINUTES OF THE BOARDS OF DIRECTORS OF SJHSRI, THE PLAN, RWH, OR CHARTERCARE, AND ALL DOCUMENTS RELATING TO MINUTES OF ANY COMMITTEE OR SUBCOMMITTEE THEREOF;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to minutes” because the phrase is too vague. SJHSRI believes meeting minutes and agendas responsive to this request are within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including meeting minutes, resolutions, a member directory and resignations of board members.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

10) **ALL DOCUMENTS RELATING TO IDENTIFICATION OR ENUMERATION OF THE DIRECTORS OF SJHSRI, THE PLAN, RWH, OR CHARTERCARE, OR THEIR APPOINTMENTS, TENURES, RESIGNATIONS, OR TERMINATIONS, INCLUDING RESUMES OR CURRICULA VITAE;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to identification or enumeration” because the phrase is too vague. SJHSRI believes meeting minutes, resolutions and agendas responsive to this request are within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including meeting minutes, resolutions, a member directory and resignations of board members.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.



11) **ALL DOCUMENTS RELATING TO IDENTIFICATION OR ENUMERATION OF THE OFFICERS OF SJHSRI, THE PLAN, RWH, OR CHARTERCARE, OR THEIR APPOINTMENTS, TENURES, RESIGNATIONS, OR TERMINATIONS, INCLUDING RESUMES OR CURRICULA VITAE;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to identification or enumeration” because the phrase is too vague. SJHSRI believes meeting minutes, resolutions and agendas responsive to this request are within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including meeting minutes, resolutions, a member directory and resignations of board members.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been

bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

12) ALL DOCUMENTS RELATING TO IDENTIFICATION OR ENUMERATION OF HUMAN RESOURCES EMPLOYEES OF SJHSRI, THE PLAN, RWB, OR CHARTERCARE, OR THEIR APPOINTMENTS, TENURES, RESIGNATIONS, OR TERMINATIONS, INCLUDING RESUMES OR CURRICULA VITAE;

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to identification or enumeration” because the phrase is too vague. SJHSRI believes meeting minutes, resolutions and agendas responsive to this request are within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including meeting minutes, resolutions, a member directory and resignations of board members. Additionally, SJHSRI believes that Prospect is in possession, custody or control of documents potentially responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point

in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. SJHSRI is prepared to produce the 34 boxes of Prospect records without prior review, subject to a protective order, if and when SJHSRI is permitted access.

**13) ALL DOCUMENTS RELATING TO PAYROLL OR EXPENSE RECORDS FOR EMPLOYEES OF SJHSRI, THE PLAN, RWH, OR CHARTERCARE, AFTER MAY 2014;**

1. *Have the documents for this category been identified?*

SJHSRI identified and produced all documents in its possession, custody or control responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI is in possession of payroll records for June 1, 2014 to June 19, 2014. SJHSRI does not have any payroll records after June 19, 2014, because SJHSRI did not have any employees after June 19, 2014.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

5. *Has a privilege log been prepared for this category?*

No

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI1729 to SJHSRI2252.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

14) **ALL DOCUMENTS RELATING TO COMMUNICATIONS (INCLUDING CORRESPONDENCE AND NOTES OF CONVERSATIONS) TO OR FROM BANK OF AMERICA, FLEET BANK, MERCER, THE ANGELL PENSION GROUP, OR THE OFFICE OF THE RHODE ISLAND ATTORNEY GENERAL, IN RELATION TO THE PLAN;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to communications” because the phrase is too vague. Nonetheless, SJHSRI believes it has identified four categories of documents that may contain correspondence potentially responsive to this request. First, SJHSRI’s Corporate Records. Second, SJHSRI has identified correspondence responsive to this request within its Electronic Records, including correspondence with Bank of America, Angell Pension, Mercer Investment and the Office of the Rhode Island Attorney General. Third, responsive documents are in the possession, custody or control of the Receiver. Fourth, SJHSRI believes that correspondence responsive to this request are in the possession of Prospect and the parties identified in the request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include correspondence responsive to this request.

Correspondence responsive to this request are in the possession, custody or control of the Receiver and SJHSRI is under no duty to pursue such records.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The portion of Electronic Records that is ready for production has been bates-stamped SJHSRI041674 to SJHSRI049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive documents may be located in the 37,000 pages of Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI1603 to SJHSRI1728.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. SJHSRI is prepared to produce the 34 boxes of Prospect records without prior review, subject to a protective order, if and when SJHSRI is permitted access.



- 15) ALL DOCUMENTS RELATING TO COMMUNICATIONS (INCLUDING CORRESPONDENCE AND NOTES OF CONVERSATIONS) TO OR FROM THE U.S. INTERNAL REVENUE SERVICE AND/OR THE U.S. DEPARTMENT OF LABOR AND/OR THE RHODE ISLAND DIVISION OF TAXATION RELATING TO THE PLAN, INCLUDING ANY OPINION LETTERS AND LETTER RULINGS AND ANY CORRESPONDENCE RELATING TO OPINION LETTERS OR LETTER RULINGS OR REQUESTS FOR SAME;

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to communications” because the phrase is too vague. Nonetheless, SJHSRI believes correspondence potentially responsive to this request may be within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including two determination letters from the IRS and a letter from the IRS. Additionally, SJHSRI believes that Prospect is in possession, custody or control of documents potentially responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI is in possession of and already produced two IRS determination letters and an IRS letter. SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include additional correspondence responsive to this request.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. SJHSRI’s Electronic Records have been scanned. The Electronic Records prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

- a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive correspondence may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI2253 to SJHSRI2266.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. SJHSRI is prepared to produce the 34 boxes of Prospect records without prior review, subject to a protective order, if and when SJHSRI is permitted access.

16) ALL DOCUMENTS RELATING TO COMMUNICATIONS (INCLUDING CORRESPONDENCE, NOTES OF CONVERSATIONS, AND DIRECTIVES) TO OR FROM THE BISHOP OF PROVIDENCE (OR HIS DESIGNEES OR AGENTS) OR THE DIOCESE (OR ITS DESIGNEES OR AGENTS) CONCERNING THE MANAGEMENT, ADMINISTRATION, GOVERNANCE, FINANCES, OR CATHOLICITY OF SJHSRI OR THE PLAN;

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to communications” because the phrase is too vague. Nonetheless, SJHSRI believes correspondence potentially responsive to this request may be within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including an April 2013 resolution of the Bishop of Providence and communications involving persons with a Diocese email address. SJHSRI believes that Prospect, the Bishop of Providence and/or the Diocese are in possession, custody or control of documents potentially responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include correspondence responsive to this request. SC subpoenaed Prospect and the Diocese who may be in possession of responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. SJHSRI’s Electronic Records have been scanned. The Electronic Records prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point

in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive correspondence may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced a document bates-stamped SJHSRI2267.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. SJHSRI is prepared to produce the 34 boxes of Prospect records without prior review, subject to a protective order, if and when SJHSRI is permitted access.

17) ALL DOCUMENTS RELATING TO COMMUNICATIONS (INCLUDING CORRESPONDENCE AND NOTES OF CONVERSATIONS) TO OR FROM THE RHODE ISLAND DEPARTMENT OF HEALTH OR THE HEALTH PLANNING AND ACCOUNTABILITY ADVISORY COUNCIL REGARDING HOSPITAL MERGERS OR CONVERSIONS;

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents relating to communications.” Nonetheless, SJHSRI believes correspondence potentially responsive to this request may be within SJHSRI’s Corporate Records. SJHSRI has identified some documents responsive to this request within its Electronic Records, including communications involving persons with a Department of Health email address. Additionally, SJHSRI believes that Prospect and/or the Department of Health are in possession, custody or control of documents potentially responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. SJHSRI’s Electronic Records have been scanned. The Electronic Records prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged

documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive correspondence may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. SJHSRI is prepared to produce the 34 boxes of Prospect records without prior review, subject to a protective order, if and when SJHSRI is permitted access.

18) **ALL CONTRACTS WITH ANY OF BANK OF AMERICA, FLEET BANK, MERCER, AND/OR THE ANGELL PENSION GROUP, OR ANY OF THEIR PREDECESSORS OR SUCCESSORS;**

1. *Have the documents for this category been identified?*

SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI's Corporate Records. Second, SJHSRI has identified some documents responsive to this request within its Electronic Records, including account agreements with Bank of America and/or Citizens Bank, and engagement agreements with Mercer Investment and/or Angell Pension Group. Third, responsive documents are in the possession, custody or control of the Receiver.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Since the inception of the Receivership, the Receiver has been in possession, custody and control of documents responsive to this request by virtue of his authority to direct Bank of America, Citizens Bank, Mercer Investments and Angell Pension Group to provide copies of contracts to him. SJHSRI does not have any obligation to pursue records already in the Receiver's possession, custody or control.

Notwithstanding the above response, SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include contracts responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

The Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore

SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive correspondence may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.



19) ALL DOCUMENTS SUBMITTED (INCLUSIVE OF SUPPLEMENTAL SUBMISSIONS AND EXHIBITS) TO THE ATTORNEY GENERAL'S OFFICE, THE RHODE ISLAND DEPARTMENT OF HEALTH, OR ANY OTHER AGENCY OF STATE OR FEDERAL GOVERNMENT, REGARDING THE PLAN OR HOSPITAL CONVERSIONS OR MERGERS, INCLUDING WITHOUT LIMITATION THE CONVERSION TRANSACTIONS APPROVED IN 2009 AND 2014;

1. *Have the documents for this category been identified?*

SJHSRI believes that documents potentially responsive to this request are within the Prospect Records and in the records of the Rhode Island Attorney General.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

No.

4. *Have the documents for this category been reviewed for privilege?*

No.

a. *If yes, provide the number of privileged documents.*

N/A

b. *If no, when will they be reviewed?*

In the event that SJHSRI is granted access to the Prospect Records, SJHSRI is prepared to produce such records without review but subject to a protective order.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A.

9. *If not all documents have been produced, when will they be produced?*

In the event that SJHSRI is granted access to the Prospect Records, SJHSRI is prepared to produce such records without review but subject to a protective order.

**20) ALL DOCUMENTS CONCERNING FINANCIAL ASSISTANCE, PAYMENTS, OR LOANS FROM THE DIOCESE, OR THE INTER-PARISH LOAN FUND, INC., OR ANY OTHER ENTITY, TO SJHSRI, THE PLAN, RWH, OR CHARTERCARE;**

*1. Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents concerning financial assistance” because the phrase is too vague. With respect to loans to SJHSRI from the entities listed in the request, SJHSRI believes potentially responsive documents may be within SJHSRI’s Corporate Records or within its Electronic Records.

Regarding loans to the Plan by any of the parties identified in the request, the Receiver is in possession, custody or control of responsive documents.

*2. Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents relating to loans to SJHSRI responsive to the request. SJHSRI produced bank statements, tax returns, balance sheets, annual reports and the cy pres petition.

The Receiver is in possession, custody or control of responsive documents relating to loans to the Plan. SJHSRI has no duty to obtain such records from the Receiver.

*3. Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

*4. Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged

documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive correspondence may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4607 to SJHSRI4688, SJHSRI4190 to SJHSRI4298 and SJHSRI4689 to SJHSRI4726.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

21) ALL DOCUMENTS CONCERNING FINANCIAL ASSISTANCE, PAYMENTS, OR LOANS TO THE DIOCESE OR THE INTER-PARISH LOAN FUND, INC., OR ANY OTHER ENTITY, FROM SJHSRI, THE PLAN, RWH, OR CHARTERCARE;

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “documents concerning financial assistance” because the phrase is too vague. With respect to loans from SJHSRI to any of the entities identified in the request, SJHSRI believes potentially responsive documents may be within SJHSRI’s Corporate Records or within its Electronic Records.

Regarding loans from the Plan to any of the entities identified in the request, the Receiver is in possession, custody or control of responsive documents.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to the request relating to loans to SJHSRI.

The Receiver is in possession, custody or control of responsive documents relating to loans from the Plan. SJHSRI has no duty to obtain such records from the Receiver.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged

documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4607 to SJHSRI4688, SJHSRI4190 to SJHSRI4298 and SJHSRI4689 to SJHSRI4726.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

**22) ALL ARTICLES OF INCORPORATION, BYLAWS, LIMITED LIABILITY COMPANY AGREEMENTS, AND OPERATING AGREEMENTS, INCLUDING ANY AMENDMENTS OR REVISIONS THERETO, OF THE PLAN, SJHSRI, RWH, OR CHARTERCARE;**

*1. Have the documents for this category been identified?*

SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI's Corporate Records. Second, SJHSRI has identified some documents responsive to this request within its Electronic Records, including amended by-laws, articles of incorporation, and amended articles of incorporation. Third, potentially responsive documents are in the possession, custody or control of the Receiver.

*2. Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI does not have any obligation to pursue records already in the Receiver's possession, custody or control.

Notwithstanding the above response, SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

*3. Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

*4. Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that additional responsive correspondence may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI2268 to SJHSRI2361.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.



**23) ALL DOCUMENTS CONCERNING DENOMINATIONAL REQUIREMENTS OR STATEMENTS OF FAITH FOR EMPLOYEES, DIRECTORS, OFFICERS, AGENTS, MANAGERS, FIDUCIARIES, MEMBERS, PHYSICIANS, NURSES, OR PATIENTS OF SJHSRI OR THE PLAN;**

1. *Have the documents for this category been identified?*

SJHSRI has not yet identified any documents responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has

not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

**24) ALL DOCUMENTS CONCERNING ANY ERISA FIDELITY BONDS;**

1. *Have the documents for this category been identified?*

SJHSRI has not yet identified any documents responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and the Electronic Records in its possession that may include documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents, if any, may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

**25) ALL INSURANCE POLICIES (INCLUDING UMBRELLA AND EXCESS POLICIES) UNDER WHICH SJHSRI OR THE PLAN HAS BEEN OR WAS PROVIDED WITH INSURANCE COVERAGE DURING THE PERIOD FROM JANUARY 1, 2003 THROUGH THE PRESENT, INCLUSIVE (WHETHER OR NOT SJHSRI CONTENDS OR DENIES THERE IS COVERAGE THAT MAY BE RELEVANT TO THE PLAN);**

*1. Have the documents for this category been identified?*

SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI's Corporate Records. Second, SJHSRI has identified some documents responsive to this request within its Electronic Records, including copies of policies from 2014 to present. Third, responsive documents are in the possession, custody or control of the Receiver.

*2. Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI does not have any obligation to pursue records already in the Receiver's possession, custody or control.

Notwithstanding the above response, SJHSRI has 37,000 pages of Corporate Records. SJHSRI is in possession of the Electronic Records which include insurance policies from 2014 to present. Additional insurance policies may be located during SJHSRI's further review of the Electronic Records not yet reviewed.

*3. Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

*4. Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point

in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

26) ALL INSURANCE DOCUMENTS RELATING TO SELF-INSURANCE FUNDS OR TRUSTS UNDER WHICH SJHSRI OR THE PLAN HAS BEEN OR WAS PROVIDED WITH INSURANCE COVERAGE DURING THE PERIOD FROM JANUARY 1, 2003 THROUGH THE PRESENT, INCLUSIVE (WHETHER OR NOT SJHSRI CONTENDS OR DENIES THERE IS COVERAGE THAT MAY BE RELEVANT TO THE PLAN);

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “all insurance documents relating to self-insurance funds or trusts” because the phrase is too vague. SJHSRI believes it has identified three categories of documents potentially responsive to this request. First, SJHSRI’s Corporate Records. Second, SJHSRI has identified some documents responsive to this request within its Electronic Records, including copies of policies from 2014 to present. Third, potentially responsive documents are in the possession, custody or control of the Receiver.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI does not have any obligation to pursue records already in the Receiver’s possession, custody or control.

Notwithstanding the above response, SJHSRI has 37,000 pages of Corporate Records. SJHSRI is in possession of the Electronic Records which include all insurance policies from 2014 to present. Additional insurance policies may be located during SJHSRI’s further review of the Electronic Records not yet reviewed.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI’s Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore

SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.



**27) ALL AUDITED OR UNAUDITED FINANCIAL STATEMENTS RELATING TO SJHSRI OR THE PLAN;**

*1. Have the documents for this category been identified?*

SJHSRI identified and produced some documents responsive to this request, including a balance sheet, cash flow statement and transaction reports. SJHSRI believes that additional records responsive to this request are in the possession, custody or control of Prospect and/or the Receiver.

*2. Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI is in possession of its Corporate Records and Electronic Records. SJHSRI believes that Prospect is in possession of potentially responsive documents. Further, the Receiver is in possession, custody or control of responsive records and SJHSRI has no duty to obtain records from the Receiver.

*3. Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

*4. Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI4190 to SJHSRI4298 and SJHSRI4689 to SJHSRI4726.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

**28) ALL FEDERAL AND STATE TAX RETURNS, INCLUDING ALL FORM 990 FILINGS OR AMENDMENTS, ALL FORM 990-PF FILINGS OR AMENDMENTS, AND ALL FORM 5500 OR FORM 5500-SF FILINGS AND AMENDMENTS, FOR SJHSRI, THE PLAN, RWH, OR CHARTERCARE;**

1. *Have the documents for this category been identified?*

SJHSRI believes it has identified documents responsive to this request in its Electronic Records from 2004 to 2015. SJHSRI believes that additional documents responsive to this request are within the Prospect Records.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes, SJHSRI's Electronic Records are in its possession, including responsive records from 2004 to 2015.

SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI produced documents responsive to this request from 2004 to 2015, including those bates-stamped SJHSRI2362 to SJHSRI4189.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents responsive to this request from 2004 to 2015, including those bates-stamped SJHSRI2362 to SJHSRI4189. SJHSRI believes that additional documents may be within the Prospect Records.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI continues to review its Electronic Records and has made a proposal as to the production of its Corporate Records.

29) ALL APPLICATIONS AND SUBMISSIONS TO THE U.S. CONFERENCE OF CATHOLIC BISHOPS RELATING TO TAXATION OR TAX EXEMPTION (AND ANY RELATED CORRESPONDENCE OR RESPONSES), INCLUDING ALL FORM 0928A FORMS AND ATTACHMENTS;

1. *Have the documents for this category been identified?*

SJHSRI has not yet identified any documents responsive to this request. SJHSRI believes that Prospect may be in possession, custody or control of responsive documents.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has 37,000 pages of Corporate Records and Electronic Records, that SJHSRI has not yet reviewed, which may contain responsive documents. SJHSRI believes that Prospect is in possession of potentially responsive documents.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. The Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the 37,000 pages of Corporate Records or the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI.

30) ALL DOCUMENTS PRODUCED OR OBTAINED IN DISCOVERY IN GMUER, M.D. V. ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND, 09-CV-00628 (D.R.I.), INCLUDING RESPONSES TO SUBPOENAS DUCES TECUM OR REQUESTS FOR PRODUCTION OF DOCUMENTS, ANSWERS TO INTERROGATORIES, AND DEPOSITION TRANSCRIPTS;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. Although SJHSRI cannot state with certainty because the records may have been destroyed, SJHSRI believes that the attorney who represented SJHSRI would be in possession of responsive documents. SJHSRI sent a written request to SJHSRI's attorney asking for responsive documents.

Additionally, counsel for Gmuer at Pierce Atwood, LLP is in possession of responsive documents. SJHSRI requested that Pierce Atwood, LLP provide responsive documents to SJHSRI. There is a settlement agreement that contains a confidentiality provision. SJHSRI is communicating with Pierce Atwood, LLP regarding how to handle confidentiality.

3. *Have the documents for this category been scanned and bates stamped?*

No.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI conducted a preliminary review of the Gmuer file located at Pierce Atwood, LLP and did not identify any privileged documents. SJHSRI has not received any documents from its counsel, including any documents that may be privileged or confidential.

a. *If yes, provide the number of privileged documents.*

SJHSRI did not identify any documents subject to SJHSRI's privileges contained in the documents located at Pierce Atwood, LLC.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is not in possession of documents responsive to this request, despite requesting such documents from its counsel. Additionally, SJHSRI is waiting for Pierce Atwood to furnish to SJHSRI electronic copies of responsive documents.



31) **ALL OTHER DOCUMENTS RELATING TO GMUER, M.D. V. ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND, 09-CV-00628 (D.R.I.), INCLUDING ALL CORRESPONDENCE TO OR FROM PLAINTIFF'S COUNSEL AND ALL SETTLEMENT DOCUMENTS;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. Although SJHSRI cannot state with certainty because the records may have been destroyed, SJHSRI believes that the attorney who represented SJHSRI would be in possession of responsive documents. SJHSRI sent a written request to SJHSRI's attorney asking for responsive documents.

Additionally, counsel for Gmuer at Pierce Atwood, LLP is in possession of responsive documents. SJHSRI requested that Pierce Atwood, LLP provide responsive documents to SJHSRI. There is a settlement agreement that contains a confidentiality provision. SJHSRI is communicating with Pierce Atwood, LLP regarding how to handle confidentiality.

3. *Have the documents for this category been scanned and bates stamped?*

No.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI conducted a preliminary review of the Gmuer file located at Pierce Atwood, LLP and did not identify any privileged documents. SJHSRI has not received any documents from its counsel, including those that may be privileged or confidential.

*a. If yes, provide the number of privileged documents.*

SJHSRI did not identify any documents subject to SJHSRI's privileges within the records at Pierce Atwood, LLP.

*b. If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is not in possession of documents responsive to this request, despite requesting such documents from its counsel. Additionally, SJHSRI is waiting for Pierce Atwood to furnish to SJHSRI electronic copies of responsive documents.

**32) ALL DOCUMENTS PRODUCED OR OBTAINED IN DISCOVERY IN MONIZ V. ST. JOSEPH HOSPITAL, 95-CV-00102 (D.R.I.), INCLUDING RESPONSES TO SUBPOENAS DUCES TECUM OR REQUESTS FOR PRODUCTION OF DOCUMENTS, ANSWERS TO INTERROGATORIES, AND DEPOSITION TRANSCRIPTS;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

3

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

Yes.

6. *Has a privilege log been produced?*

Yes.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4727 to SJHSRI4746.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**33) ALL OTHER DOCUMENTS RELATING TO MONIZ V. ST. JOSEPH HOSPITAL, 95-CV-00102 (D.R.I.), INCLUDING ALL CORRESPONDENCE TO OR FROM PLAINTIFF'S COUNSEL AND ALL SETTLEMENT DOCUMENTS;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

3

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

Yes.

6. *Has a privilege log been produced?*

Yes.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4727 to SJHSRI4746.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

34) ALL DOCUMENTS (INCLUDING DISKS OF DOCUMENTS) RELATING TO ANY CY PRES PETITION OR MATTER, INCLUDING IN RE: CHARTERCARE HEALTH PARTNERS FOUNDATION, ROGER WILLIAMS HOSPITAL, AND ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND (KM-2015-0035), IN RE CHARTERCARE HEALTH PARTNERS (PB-2011-6822), SAINT JOSEPH HEALTH SERVICES AND SAINT JOSEPH HEALTH SERVICES FOUNDATION V. PATRICK C. LYNCH (PB- 2009-6693), ROGER WILLIAMS HOSPITAL V. PATRICK C. LYNCH (PB-2009-6694), AND ROGER WILLIAMS MEDICAL CENTER V. PATRICK LYNCH (PB-2009-6695), INCLUDING ANY REPORTS OR DISCLOSURES SUBMITTED TO THE ATTORNEY GENERAL'S OFFICE RELATING TO CY PRES MATTERS;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI produced the cy pres petition and order approving cy pres petition in its possession. SJHSRI is in possession of a disc responsive to this request, however SJHSRI has been advised that Prospect does not consent to the production of such disc.

SJHSRI believes that Prospect and the Attorney General are in possession, custody or control of the documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4607 to SJHSRI4688.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A



**35) ALL DOCUMENTS (INCLUDING ACCOUNTING RECORDS) RELATING TO TRANSFERS OR DISPOSITIONS OF ASSETS THAT ARE OR WERE THE SUBJECT OF ANY CY PRES PETITION;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI produced the cy pres petition, order approving cy pres petition, a summary of transfers, bank statements, and a letter of direction in its possession.

SJHSRI believes that Prospect and the Attorney General are in possession, custody or control of the documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4607 to SJHSRI4688.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**36) ALL DOCUMENTS RELATING TO REPORTING AND/OR ACCOUNTING OF PROFITS FROM PROSPECT;**

1. *Have the documents for this category been identified?*

SJHSRI has not completed its review of SJHSRI's Corporate Records and Electronic Records. It is possible that such records could contain documents relating to the profits of Prospect.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

It is possible that SJHSRI's Corporate Records or Electronic Records could contain documents responsive to this request. Furthermore, SJHSRI believes that Prospect is in possession, custody or control of the documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

No.

4. *Have the documents for this category been reviewed for privilege?*

No.

a. *If yes, provide the number of privileged documents.*

N/A.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI will continue to review its Electronic Records to identify documents responsive to this request.

**37) ALL DOCUMENTS RELATING TO THE ASSETS OF SJHSRI (AS DISTINGUISHED FROM THOSE OF ITS AFFILIATED ENTITIES) SINCE 2003;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “all documents relating to the assets of SJHSRI” because the phrase is too vague. SJHSRI identified balance sheets, bank statements from 2014 to 2017, and tax returns relating to the assets of SJHSRI.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI is in possession of balance sheets, bank statements from 2014 to 2017 and tax returns. SJHSRI believes that Prospect is in possession of the records prior to 2014.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4190 to SJHSRI4298 and SJHSRI4689 to SJHSRI4726.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**38) ALL DOCUMENTS RELATING TO THE ASSETS OF SJHSRI (AS CONSOLIDATED WITH ITS AFFILIATED ENTITIES) SINCE 2003;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by “all documents relating to the assets of SJHSRI” because the phrase is too vague. SJHSRI identified balance sheets, bank statements from 2014 to 2017, and tax returns relating to the assets of SJHSRI.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI is in possession of balance sheets, bank statements from 2014 to 2017 and tax returns. SJHSRI believes that Prospect is in possession of the records prior to 2014.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4190 to SJHSRI4298 and SJHSRI4689 to SJHSRI4726.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A



**39) ALL DOCUMENTS RELATING TO ANY CONSIDERATION GIVEN OR OBTAINED BY CHARTERCARE IN CONNECTION WITH THE SALE TRANSACTION CONCERNING THE ASSET PURCHASE AGREEMENT DATED AS OF SEPTEMBER 24, 2013, OTHER THAN THE TRANSFER OF ASSETS BY ANY OF CHARTERCARE'S SUBSIDIARIES;**

1. *Have the documents for this category been identified?*

SJHSRI does not know what is meant by "all documents relating to any consideration" because the phrase is too vague. SJHSRI has identified the cy pres petition, order approving cy pres petition, a summary of transfers, bank statements, and a letter of direction.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has and produced the cy pres petition, order approving cy pres petition, a summary of transfers, bank statements, and a letter of direction in its possession. SJHSRI believes that Prospect and the Attorney General are in possession, custody or control of documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4607 to SJHSRI4688.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

40) ALL QUICKBOOKS FILES (OR FILES FOR SIMILAR ACCOUNTING SOFTWARE) FOR THE PLAN, SJHSRI, RWH, AND CHARTERCARE, SINCE 2003;

1. *Have the documents for this category been identified?*

SJHSRI has identified the QuickBooks files for the time period of December 2014 to present. SJHSRI believes that the QuickBooks files for the time period prior to December 2014 are in the possession of Prospect.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI is in possession of the QuickBooks files for the time period of December 2014 to present. SJHSRI believes that Prospect is in possession of the QuickBooks files for the time period prior to December 2014.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Electronic Records, including the QuickBooks files for December 2014 to present have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553. SJHSRI continues its review of the Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has

not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

SJHSRI believes that responsive documents may be located in the Electronic Records, including those Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records, including QuickBooks files from December 2014 to present.

41) ALL DOCUMENTS GIVEN OR TRANSMITTED TO EMPLOYEES OR PROSPECTIVE EMPLOYEES REFERRING TO THE PLAN OR ANY EMPLOYEE BENEFITS, INCLUDING WITHOUT LIMITATION EMPLOYEE HANDBOOKS, MANUALS, SUMMARIES AND THE LIKE, FROM THE INCEPTION OF THE PLAN TO THE PRESENT TIME;

1. *Have the documents for this category been identified?*

SJHSRI has not yet identified any documents during its review of SJHSRI's records responsive to this request. It is possible that documents responsive to this request are contained in the Electronic Records or Corporate Records that SJHSRI has not reviewed. SJHSRI believes that records responsive to his request are in the possession of Prospect.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

It is possible that SJHSRI is in possession of documents responsive to this request within the Corporate Records or Electronic Records that SJHSRI has not yet reviewed. SJHSRI believes that Prospect is in possession of records responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Electronic Records have been scanned. The Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553. SJHSRI continues its review of the Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

It is possible that responsive documents may be located in the Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.

42) **ALL DOCUMENTS RELATING TO RECRUITMENT ADVERTISEMENTS FOR EMPLOYEES OR POSITIONS TO WHOM THE PLAN WAS OR COULD BE APPLICABLE, FROM THE INCEPTION OF THE PLAN TO THE PRESENT TIME;**

1. *Have the documents for this category been identified?*

SJHSRI has not yet identified any documents during its review of SJHSRI's records responsive to this request. It is possible that documents responsive to this request are contained in the Electronic Records or Corporate Records that SJHSRI has not reviewed. SJHSRI believes that records responsive to his request are in the possession of Prospect.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

It is possible that SJHSRI is in possession of documents responsive to this request within the Corporate Records or Electronic Records that SJHSRI has not yet reviewed. SJHSRI believes that Prospect is in possession of records responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673. SJHSRI's Electronic Records have been scanned. The additional Electronic Records that SJHSRI has reviewed and prepared for production have been bates-stamped SJHSRI041674 to 049553. SJHSRI continues its review of the Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to 049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and will produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents that have not been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

It is possible that responsive documents may be located in the Corporate Records or Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 and the reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.



**43) ALL DOCUMENTS RELATING TO DOCUMENT RETENTION POLICIES;**

1. *Have the documents for this category been identified?*

Since December 2014, SJHSRI did not adopt any written document retention policy. SJHSRI believes that records responsive to his request are in the possession of Prospect.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI believes that Prospect is in possession of records responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

N/A

4. *Have the documents for this category been reviewed for privilege?*

N/A

a. *If yes, provide the number of privileged documents.*

N/A

b. *If no, when will they be reviewed?*

N/A

5. *Has a privilege log been prepared for this category?*

N/A

6. *Has a privilege log been produced?*

N/A

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

44) **ALL DOCUMENTS RELATING TO THE PURCHASE PRICE OR VALUATIONS OF ASSETS FOR THE TRANSACTION REFERRED TO IN PARAGRAPH 5 OF THE VERIFIED PETITION;**

1. *Have the documents for this category been identified?*

SJHSRI believes that it is possible that records responsive to this request may be located in the Corporate Records that SJHSRI has not yet reviewed. Further, SJHSRI believes that the documents responsive to this request are in the possession of Prospect.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

It is possible that documents responsive to this request are in the Corporate Records that SJHSRI has not yet reviewed. Further, SJHSRI believes that Prospect is in possession of records responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

SJHSRI's Corporate Records have been scanned and bates-stamped SJHSRI004747 to SJHSRI041673.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI did not complete a privilege review of the Corporate Records.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed a review of the Corporate Records, therefore SJHSRI does not know the total number of privileged documents.

b. *If no, when will they be reviewed?*

SJHSRI has proposed to produce the Corporate Records without a privilege review, subject to a protective order.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

It is possible that responsive documents may be located in the Corporate Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

None.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the Corporate Records bates-stamped SJHSRI004747 to SJHSRI041673 upon the entry of a protective order agreeable to SJHSRI.

**45) ALL DOCUMENTS RELATING TO THE “ELECT[ION] TO CONTRIBUTE \$14,000,000 TO THE PLAN” REFERRED TO IN PARAGRAPH 5 OF THE VERIFIED PETITION;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has and produced the cy pres petition, order approving cy pres petition, a summary of transfers, bank statements, and a letter of direction, annual report, and wire transfer statement. SJHSRI believes that Prospect and the Attorney General are in possession, custody or control of documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4299 to SJHSRI4421 and SJHSRI4607 to SJHSRI4688.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**46) ALL DOCUMENTS RELATING TO THE CONTINUATION OF  
“AFFILIATION DURING AND AFTER THE SALE” REFERRED TO IN  
PARAGRAPH 6 OF THE VERIFIED PETITION;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

SJHSRI has and produced the cy pres petition, order approving cy pres petition, a summary of transfers, bank statements, and a letter of direction, annual report, and wire transfer statement. SJHSRI believes that Prospect and the Attorney General are in possession, custody or control of documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4299 to SJHSRI4421 and SJHSRI4607 to SJHSRI4688.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A



**47) ALL DOCUMENTS RELATING TO THE DIFFERENT “CONCEPT[S] OF ‘FUNDING’” REFERRED TO IN FOOTNOTE 3 OF THE VERIFIED PETITION;**

1. *Have the documents for this category been identified?*

No. There are no documents “relating to the different concepts of funding” responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. There are no documents “relating to the different concepts of funding” responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

N/A.

4. *Have the documents for this category been reviewed for privilege?*

N/A.

a. *If yes, provide the number of privileged documents.*

N/A.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

N/A.

6. *Has a privilege log been produced?*

N/A.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

48) ALL DOCUMENTS RELATING TO “ALL OF THE LONG-TERM ISSUES AFFECTING THE PLAN” THAT WERE NOT “CONSIDER[ED]”, REFERRED TO IN FOOTNOTE 3 OF THE VERIFIED PETITION;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4422 to SJHSRI4594.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**49) ALL DOCUMENTS RELATING TO THE STATEMENT IN PARAGRAPH 7 OF THE VERIFIED PETITION THAT “PETITIONER IS ADVISED AND BELIEVES THAT THE PLAN WILL LOSE ‘CHURCH PLAN’ STATUS ON OR BEFORE DECEMBER 31, 2018”;**

1. *Have the documents for this category been identified?*

No. There are no documents responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. There are no documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

N/A.

4. *Have the documents for this category been reviewed for privilege?*

N/A.

a. *If yes, provide the number of privileged documents.*

N/A.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

N/A.

6. *Has a privilege log been produced?*

N/A.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

50) ALL DOCUMENTS RELATING TO OR SUPPORTING THE ASSERTION THAT "PETITIONER DOES NOT HAVE THE FINANCIAL RESOURCES TO MAKE SUCH PAYMENTS, OR TO COMPLY WITH THE OTHER FINANCIAL AND REGULATORY REQUIREMENTS OF ERISA" IN PARAGRAPH 8 OF THE VERIFIED PETITION;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

While all of SJHSRI's Electronic Records have been scanned, not all such records have been bates-stamped for production. SJHSRI continues to review its Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

*a. If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and produce a privilege log upon completion of its review.

*b. If no, when will they be reviewed?*

SJHSRI is currently reviewing the 1,425 Electronic Documents in its possession, custody or control that have not already been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No. SJHSRI believes that additional responsive documents may be located in the Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 that have not yet been produced and may also be in the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI20 to SJHSRI305, SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4190 to SJHSRI4298, SJHSRI4422 to SJHSRI4594 and SJHSRI4595 to SJHSRI4606.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.



51) ALL DOCUMENTS CONCERNING THE DERIVATION OF OR RATIONALE FOR THE REQUEST IN THE VERIFIED PETITION TO REDUCE PENSION BENEFITS IN THE SPECIFIC AMOUNT OF 40%, INCLUDING BY WHOM, WHEN, AND HOW THE 40% FIGURE WAS DERIVED;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

While all of SJHSRI's Electronic Records have been scanned, not all such records have been bates-stamped for production. SJHSRI continues to review its Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents in its possession, custody or control that have not already been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No. SJHSRI believes that additional responsive documents may be located in the Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 that have not yet been produced and may also be in the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI20 to SJHSRI305, SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4190 to SJHSRI4298, SJHSRI4422 to SJHSRI4606.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.

52) ALL DOCUMENTS RELATING TO THE “REQUEST[ ] THAT ANGELL PERFORM AN ANALYSIS OF THE PLAN BASED UPON A UNIFORM REDUCTION OF 40%” IN PARAGRAPH 13 OF THE VERIFIED PETITION;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

While all of SJHSRI’s Electronic Records have been scanned, not all such records have been bates-stamped for production. SJHSRI continues to review its Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents in its possession, custody or control that have not already been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No. SJHSRI believes that additional responsive documents may be located in the Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 that have not yet been produced and may also be in the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI20 to SJHSRI305, SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4190 to SJHSRI4298, SJHSRI4422 to SJHSRI4606.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.

53) **ALL DOCUMENTS RELATING TO OR SUPPORTING THE ASSERTION THAT "PETITIONER BELIEVES THAT A UNIFORM REDUCTION OF 40% OF PENSION BENEFITS IS LIKELY THE MOST REASONABLE APPROACH TO ACHIEVING AN EQUITABLE RESOLUTION FOR ALL BENEFICIARIES" IN PARAGRAPH 15 OF THE VERIFIED PETITION;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

While all of SJHSRI's Electronic Records have been scanned, not all such records have been bates-stamped for production. SJHSRI continues to review its Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents in its possession, custody or control that have not already been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No. SJHSRI believes that additional responsive documents may be located in the Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 that have not yet been produced and may also be in the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI20 to SJHSRI305, SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4190 to SJHSRI4298, SJHSRI4422 to SJHSRI4606.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.

54) **ALL DOCUMENTS RELATING TO OR SUPPORTING THE STATEMENT THAT "THE NET ASSETS OF PETITIONER, RWH AND CCB MAY BECOME AVAILABLE TO ASSIST WITH THE PLAN" IN PARAGRAPH 16 OF THE VERIFIED PETITION, OR TO THE POSSIBLE OR ACTUAL DISPOSITION OF SUCH NET ASSETS;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

a. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4607 to SJHSRI4688.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A



55) ALL DOCUMENTS RELATING TO WHY THE “POTENTIAL FOR ADDITIONAL PLAN FUNDS IS NOT CONTEMPLATED BY THE BENEFIT ADJUSTMENT ANALYSIS” AS STATED IN PARAGRAPH 16 OF THE VERIFIED PETITION;

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

a. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4595 to SJHSRI4606.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**56) ALL DOCUMENTS RELATING TO WHY “PETITIONER BELIEVES THAT THE PLAN SHOULD NOT BE TERMINATED IMMEDIATELY” AS STATED IN PARAGRAPH 17 OF THE VERIFIED PETITION;**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4595 to SJHSRI4606.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

57) ALL DOCUMENTS RELATING TO THE “OPPORTUNITY TO BENEFIT FROM THE CONTRIBUTION OF ADDITIONAL FUNDS” REFERRED TO IN PARAGRAPH 18(B) OF THE VERIFIED PETITION, INCLUDING ANY DOCUMENTS IDENTIFYING SUCH ADDITIONAL FUNDS AND ANY PROJECTIONS OF ADDITIONAL FUNDS;

1. *Have the documents for this category been identified?*

No. SJHSRI does not have any documents responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. SJHSRI does not have any documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

N/A.

4. *Have the documents for this category been reviewed for privilege?*

N/A.

a. *If yes, provide the number of privileged documents.*

N/A.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

N/A.

6. *Has a privilege log been produced?*

N/A.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

58) ALL DOCUMENTS RELATING TO OR SUPPORTING THE STATEMENT IN PARAGRAPH 21 OF THE VERIFIED PETITION THAT "PETITIONER FURTHER BELIEVES THAT THE CURRENT ADMINISTRATORS AND ACTUARIES OF THE PLAN SHOULD REMAIN IN PLACE FOR ADMINISTRATIVE PURPOSES AND TO CONTINUE TO RENDER SERVICES TO THE PLAN CONSISTENT WITH PAST PRACTICE";

1. *Have the documents for this category been identified?*

No. SJHSRI does not have any documents responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. SJHSRI does not have any documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

N/A.

4. *Have the documents for this category been reviewed for privilege?*

N/A.

a. *If yes, provide the number of privileged documents.*

N/A.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

N/A.

6. *Has a privilege log been produced?*

N/A.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A



59) **ALL DOCUMENTS RELATING TO HOW OR WHY “ADMINISTRATIVE EXPENSES OF THE PLAN, OTHER THAN INVESTMENT MANAGEMENT AND CUSTODIAN FEES, HAVE BEEN PAID FOR WITH NON- PLAN ASSETS” AS REFERRED TO IN FOOTNOTE 9 OF THE VERIFIED PETITION, INCLUDING DOCUMENTS RELATING TO WHOM AND WHEN SUCH PAYMENTS HAVE BEEN MADE;**

1. *Have the documents for this category been identified?*

SJHSRI is working to identify additional documents responsive to this request and believes that documents responsive to this request may be within SJHSRI's Electronic Records.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

While all of SJHSRI's Electronic Records have been scanned, not all such records have been bates-stamped for production. SJHSRI continues to review its Electronic Records.

4. *Have the documents for this category been reviewed for privilege?*

SJHSRI reviewed the Electronic Records bates-stamped SJHSRI1 to SJHSRI4746 and SJHSRI041674 to SJHSRI049553 for privilege.

a. *If yes, provide the number of privileged documents.*

SJHSRI has not completed its review of the Electronic Records, therefore SJHSRI does not know the total number of privileged documents. At this point in its review, however, SJHSRI has identified 1,037 potentially privileged documents. SJHSRI intends to make a final determination on privilege and produce a privilege log upon completion of its review.

b. *If no, when will they be reviewed?*

SJHSRI is currently reviewing the Electronic Documents in its possession, custody or control that have not already been bates-stamped and prepared for production.

5. *Has a privilege log been prepared for this category?*

SJHSRI has not completed its review of the Electronic Records, therefore it has

not completed preparation of a privilege log.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

No. SJHSRI believes that additional responsive documents may be located in the Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 that have not yet been produced and may also be in the Electronic Records that SJHSRI has not yet reviewed.

8. *If no, what documents have been produced, provide bates numbers.*

SJHSRI produced documents bates-stamped SJHSRI322 to SJHSRI1602, SJHSRI2362 to SJHSRI4189, SJHSRI4190 to SJHSRI4298, SJHSRI4607 to SJHSRI4688.

9. *If not all documents have been produced, when will they be produced?*

SJHSRI is prepared to produce the additional reviewed Electronic Records bates-stamped SJHSRI041674 to SJHSRI049553 upon the entry of a protective order agreeable to SJHSRI. Further, SJHSRI continues its review of the Electronic Records.

60) ALL DOCUMENTS RELATING TO THE DISTINCTION BETWEEN “ADMINISTRATIVE EXPENSES” AND “INVESTMENT MANAGEMENT AND CUSTODIAN FEES” REFERRED TO IN FOOTNOTE 9 OF THE VERIFIED PETITION; AND

1. *Have the documents for this category been identified?*

No. SJHSRI does not have any documents responsive to this request.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

No. SJHSRI does not have any documents responsive to this request.

3. *Have the documents for this category been scanned and bates stamped?*

N/A.

4. *Have the documents for this category been reviewed for privilege?*

N/A.

a. *If yes, provide the number of privileged documents.*

N/A.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

N/A.

6. *Has a privilege log been produced?*

N/A.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

N/A

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

N/A

**61) ALL DOCUMENTS RELATING TO THE “IMPAIRMENT OF PARTICIPANT CLAIMS” REFERRED TO IN FOOTNOTE 9 OF THE VERIFIED PETITION.**

1. *Have the documents for this category been identified?*

Yes.

2. *Does St. Joseph Health Services of Rhode Island, Inc. have these documents in its possession? If not, who has them and what efforts are being made to retrieve them?*

Yes.

3. *Have the documents for this category been scanned and bates stamped?*

Yes.

4. *Have the documents for this category been reviewed for privilege?*

Yes.

a. *If yes, provide the number of privileged documents.*

None.

b. *If no, when will they be reviewed?*

N/A.

5. *Has a privilege log been prepared for this category?*

No.

6. *Has a privilege log been produced?*

No.

7. *Have all non-privileged documents been produced? If yes, provide bates numbers.*

Yes. SJHSRI produced documents bates-stamped SJHSRI4422 to SJHSRI4606.

8. *If no, what documents have been produced, provide bates numbers.*

N/A

9. *If not all documents have been produced, when will they be produced?*

*N/A*

St. Joseph Health Services  
of Rhode Island, Inc.,

By its attorney,

/s/ George E. Lieberman

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Dated: January 4, 2018

#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2018, I caused to be served a true copy of the within document through the Rhode Island Judiciary's Electronic Filing System on all parties designated for electronic service on the electronic filing system. The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ George E. Lieberman