

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PROVIDENCE, sc.

SUPERIOR COURT

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

v.

No. PC-2017-3856

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

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

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

1. On January 5, 2018, Special Counsel provided RCB with authorization under Rule 7(e) of the Supreme Court Rules Governing Electronic Filing to file the stipulation and protective order (“Protective Order”) that the parties had negotiated. RCB subsequently filed the Protective Order, which the Court entered.

2. That same day, RCB produced 431 documents and 2,230 pages pursuant to the Protective Order. The production consisted of confidential documents—predominantly Election of Benefits forms—containing personal identifying information of hospital employees and pension beneficiaries.

3. RCB also harvested a small collection of additional documents in response to meet and confer discussions with Special Counsel. RCB has completed its review of those documents for responsiveness and privilege and is having these documents processed for production. We anticipate

that supplemental production will occur this week, along with service of a supplemental privilege log in connection with this production.

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

Respectfully Submitted,

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

By its attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/ Howard Merten

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Date: January 9, 2018

CERTIFICATE OF SERVICE

I hereby certify that, on the 9th day of January, 2018:

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

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

/s/ Howard Merten _____