

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

STEPHEN DEL SESTO, AS RECEIVER AND :  
ADMINISTRATOR OF THE ST. JOSEPH :  
HEALTH SERVICES OF RHODE ISLAND :  
RETIREMENT PLAN, ET AL. :

Plaintiffs :

v. :

C.A. No:1:18-CV-00328-WES-LDA

PROSPECT CHARTERCARE, LLC, ET AL. :

Defendants. :

**DECLARATION OF CHRISTOPHER CALLACI**

I am general counsel for United Nurses and Allied Professionals and a member of the Rhode Island Bar since 2008. I am also admitted to practice before this Court. There are approximately 400 union members of United Nurses and Allied Professionals (“UNAP”) who are plan participants in the St. Joseph Health Services of Rhode Island Retirement Plan.

On October 10, 2018, I informed the Superior Court regarding UNAP’s members’ attitude about the settlement that was being proposed for approval by the Superior Court of the claims against Chartercare Community Board, Roger Williams Hospital and St. Joseph Health Services of Rhode Island (“Settlement A”). That settlement is now pending before this Court for final approval on a class action.

In summary, I stated:

Your Honor, the 400 or so folks that I represent have expressed their full support in the proposed settlement agreement. They see it as a ray of hope that perhaps they will be able to retire with some dignity and respect coming out of this proceeding. This approved settlement, if approved, will also move along what would otherwise be a very painful and difficult process for all involved in determining what reductions in benefits will need to be made and the extent to which planned participants will suffer in that regard. As such, we respectfully request that the Court approve the proposed settlement agreement.”

On December 14, 2018, I spoke with regard the settlement regarding CharterCARE Foundation (“Settlement B”) and stated:

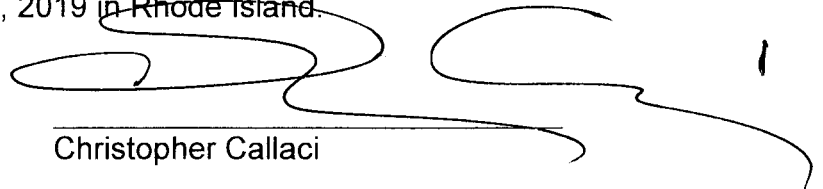
Good morning Your Honor. Chris Callaci for the United Nurses and Allied Professionals. I thought it would be the worthwhile that the Court hear from the horse's mouth of Special Counsel, Mr. Wistow's, representation and our support. We have about 400 union members who are participants in this plan and they fully trust and are confident in the Receiver's assessment that the settlement agreement is in the best interest of the receivership estate and the plan, and the plan participants, and we applaud the work that has been done in that regard.

I repeat to the Court my statements above and add that these comments apply to both proposed settlements (as well as to the legal fees requested therewith) to which the Court granted preliminary approval and which are now pending before this Court for final approval.

I also add that the fee applications proposed by Plaintiffs' counsel in connection with Settlements A and B seem eminently fair and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this <sup>th</sup> 12 of August, 2019 in Rhode Island.



Christopher Callaci