

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. 18-cv-00328-WES-LDA
	:	
	:	
PROSPECT CHARTERCARE, LLC, et al.	:	
	:	
Defendants.	:	

**DEFENDANT THE ANGELL PENSION GROUP, INC.’S STATEMENT REGARDING  
APPOINTMENT OF FEDERAL RECEIVER**

The Angell Pension Group, Inc. (“Angell”), in response to the Court’s inquiry regarding the appointment of a federal receiver at the February 12, 2019 hearing in this matter, hereby adopts the statements and arguments contained in the Prospect Entities’ Post-Hearing Memorandum in Opposition to Settlement Motion (Dkt. No. 116) insofar as they relate to the issue of appointment of a receiver by this Court.

THE ANGELL PENSION GROUP, INC.

By its attorneys,

*/s/ Steven J. Boyajian*  
Steven J. Boyajian (#7263)  
Robinson & Cole LLP  
One Financial Plaza, Suite 1430  
Providence, RI 02903  
E-mail: [sboyajian@rc.com](mailto:sboyajian@rc.com)  
Telephone: (401) 709-3300  
Facsimile: (401) 709-3399

-and-

David R. Godofsky (*pro hac vice*)  
Emily Seymour Costin (*pro hac vice*)  
ALSTON & BIRD LLP  
950 F Street, NW  
Washington, DC 20004  
E-mail: [David.godofsky@alston.com](mailto:David.godofsky@alston.com)  
E-mail: [Emily.costin@alston.com](mailto:Emily.costin@alston.com)  
Telephone: (202) 239-3300  
Facsimile: (202) 239-3333

Dated: March 12, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of March, 2019, I caused the above statement to be filed with the Court via the ECF filing system. As such, this document will be electronically sent to the registered participants identified on the Notice of Electronic Filing (NEF).

/s/ Steven J. Boyajian  
Steven J. Boyajian