

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

St. Joseph Health Services of Rhode Island, Inc. :
Petitioner :

vs. :

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

C.A. NO. PC-2017-3856

Bank of America, in its capacity as Trustee of :
Respondent :
Nominal Respondent :

MISCELLANEOUS MOTION IN SUPPORT OF SETTLEMENT AGREEMENT

I, Christopher Callaci, am counsel to approximately four hundred (400) participants in the St. Joseph Health Services of Rhode Island Retirement Plan. My clients are representative of the class of participants identified in lawsuits filed in this Court (PC-2017-3856) and the United States District Court for the District of Rhode Island (1:18-cv-00328-WES-LDA). I have spoken with many of my clients with regard to the Settlement Agreement (Agreement) between the Plaintiffs and CharterCARE Community Board, St. Joseph Health Services of Rhode Island and the corporation Roger Williams Hospital. To the individual, they have expressed their full and unwavering support for the Agreement; most if not all see it as a ray of hope that perhaps they may be able to retire with some semblance of dignity and respect as a result of the instant receivership proceeding.

It is also critical to note here that should this Agreement be approved, it could go a long way in prolonging any need for the Receiver to move to reduce benefits. Indeed, trying to determine who should suffer reductions in benefits and to what extent will be a particularly

difficult matter for the Receiver and this Honorable Court to address. It will also be a trying experience for plan participants.

On behalf of my clients, therefore, I respectfully urge this Honorable Court to enter an Order approving the subject Agreement.

Respectfully Submitted,

United Nurses & Allied Professionals,

By its attorney,

/s/ Christopher Callaci

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CERTIFICATION

I hereby certify that on September 28, 2018, I filed and served this document through 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/ Christopher Callaci