Case Number: PC-2017-3856

Filed in Providence/Bristol County Superior Court

Submitted: 9/26/2018 4:17 PM

Envelope: 1731820 Reviewer: Alexa G.

STATE OF RHODE ISLAND PROVIDENCE, SC SUPERIOR COURT

St. Joseph Health Services of Rhode

Island, Inc.

Plaintiff :

:

V. : C.A. No. PC-2017-3856

:

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

Defendants:
:

MISCELLANEOUS MOTION

I, Jeffrey W. Kasle, Esquire, am counsel to over 200 participants in the retirement plan of St. Joseph Health Services of Rhode Island. My clients are representative of the class of participants in lawsuits filed in this Court and the United States District Court for the District of Rhode Island concerning the alleged underfunded status of the St. Joseph Health Services of Rhode Island Retirement Plan. While I have not spoken with each of the over 200 participants I represent, I have met with numerous members of the group during the course of this litigation and have had an opportunity to discuss with those representative members their thoughts concerning the underfunded status of the Retirement Plan and how it impacts each of them. I can say with great confidence that the individual plan participants I represent wholeheartedly and unequivocally support the Receiver's Petition to proceed with the proposed settlement of claims against CharterCare Community Board, St. Joseph Health Services of Rhode Island and the Corporation Roger Williams Hospital with regard to the pending litigation.

On behalf of my clients, I urge this Court to allow the Receiver to finalize the proposed settlement with the above-named entities. This settlement will be, in my view, beneficial to my clients' status as members of the Retirement Plan. The proposed settlement is an excellent first step in attempting to secure additional funds to bolster the Retirement Plan and benefit my clients who are participants in the Retirement Plan.

Therefore, I wholeheartedly endorse the Receiver's actions concerning the proposed settlement and respectfully request this Court to support and authorize the Receiver's actions.

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Respectfully submitted,

JEFFREY W. KASLE, ESQ. (#2695)

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Of Counsel Olenn & Penza 530 Greenwich Avenue Warwick, RI 02886

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CERTIFICATE OF SERVICE

I hereby certify that, on the 26th day of September, 2018:

[X] I filed and served this document through the electronic filing system. The docume electronically filed and served is available for viewing and/or downloading from the Rho Island Judiciary's Electronic Filing System.	
I served this document through the electronic filing system on the following partial. The document electronical	
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[] I mailed or □ hand-delivered this document to the attorney for the opposing party and the opposing party if self-represented, whose name is at the following address	
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