

STATE OF RHODE ISLAND

SUPERIOR COURT

PROVIDENCE, SC

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, Arlene Violet, Esq., am lead counsel (along with Robert Senville, Esq.) to over 285 participants in the retirement plan of St. Joseph Health Services of Rhode Island. My clients are typical 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's Services of Rhode island Retirement Plan. While I have not spoken with each and every person whom I represent I have spoken and met with numerous members of this group during the course of this litigation, have met with the named plaintiffs in the aforesaid respective lawsuits (and numerous others), to discuss with those representative members their thoughts concerning the underfunded status of the Retirement Plan and how it impacts them, and their viewpoint regarding the settlement and I checked as of September 25, 2018 with the Receiver about any objections to the proposed settlement by my clients which might have been registered with him of which there are none. Accordingly, I can say with great confidence that the plan participants whom I represent wholeheartedly and unequivocally support the Receiver's Petition to proceed with the proposed settlement of claims against CharterCare Community Board, St. Joseph's Health Services of Rhode Island and the Corporation Roger Williams Hospital with regard to pending litigation.

On behalf of these clients I urge the Court to allow the Receiver to finalize the proposed settlement with the aforesaid entities. The settlement, in my view, is beneficial to my clients' status as members of the Retirement Plan, particularly given their advanced ages from the mid-70's to age 99, who depend upon their pension checks. 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 present participants in the Plan.

Therefore, I along with my co-counsel, wholeheartedly endorse the Receiver's actions concerning the proposed settlement and respectfully request that this Court to support and authorize the Receiver's actions.

RESPECTFULLY SUBMITTED,

/S/ARLENE VIOLET

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON THE 27TH DAY OF SEPTMEBER,2018 I FILED AND SERVED THIS DOCUMENT THROUGH THE ELECTRONIC FILING SYSTEM. THE DOCUMENT ELECTRONICALLY FILED IS AVAILABLE FOR VIEWING AND/OR DOWNLOADING FROM THE R.I. JUDICIARY ELECTRONIC FILING SYSTEM.

/S/ARLENE VIOLET