

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

CHARTERCARE COMMUNITY BOARD	:	
(through Thomas S. Hemmendinger, as Permanent	:	
Liquidating Receiver), individually and derivatively, as	:	
Member of PROSPECT CHARTERCARE, LLC and	:	C.A. No.: PC-2019-3654
As trustee of the beneficial interest of its membership	:	
Interest in PROSPECT CHARTERCARE, LLC, et al.	:	
	:	
v.	:	
	:	
SAMUEL LEE, et al.	:	

JOINT MOTION TO STAY PROCEEDINGS PENDING SETTLEMENT APPROVALS

Pursuant to that certain Settlement Agreement¹ dated as of December 30, 2020 (the “Settlement Agreement”), all parties jointly move that the Court stay all proceedings in this matter pending approval or disapproval of the settlement by the Superior Court in St. Joseph Health Services of Rhode Island, Inc. v. St. Joseph Health Services of Rhode Island Retirement Plan, C.A. No. PC-2017-3856, by the Superior Court in the matter In re: CharterCare CharterCARE Community Board, St. Joseph Health Services of Rhode Island and Roger Williams Hospital, C.A. No. PC-2019-11756, and by the U.S. District Court in the matter Stephen Del Sesto, et al., v. Prospect Chartercare, LLC, et al., C.A. No:1:18-CV-00328-WES-LDA.

¹ A copy of the Settlement Agreement was filed in the Rhode Island Superior Court as an exhibit to a Stipulation and Consent Order and is available from the Plan Receiver’s website at [https://www.pierceatwood.com/sites/default/files/Stipulation%20%26%20Consent%20Order%20\(entered\)%20\(Prospect%20%26%20Angell%20settlement\)%5B12639889v1%5D.PDF](https://www.pierceatwood.com/sites/default/files/Stipulation%20%26%20Consent%20Order%20(entered)%20(Prospect%20%26%20Angell%20settlement)%5B12639889v1%5D.PDF).

Respectfully Submitted,

STEPHEN DEL SESTO, AS RECEIVER AND
ADMINISTRATOR OF THE ST. JOSEPH
HEALTH SERVICES OF RHODE ISLAND
RETIREMENT PLAN, et al.

By Their Attorneys,
WISTOW, SHEEHAN & LOVELEY, PC

/s/ Stephen P. Sheehan

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PROSPECT MEDICAL HOLDINGS, INC.
PROSPECT EAST HOLDINGS, INC., and
PROSPECT EAST HOSPITAL ADVISORY
SERVICES, LLC

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/s/ Thomas Hemmendinger

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ANDREA DOYLE,

By their Attorneys,

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January 28, 2021

CERTIFICATE OF SERVICE

I hereby certify that, on the 28th day of January, 2021, I filed and served the foregoing document through the electronic filing system on the following users of record:

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The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Benjamin Ledsham _____