

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

ST. JOSEPH HEALTH SERVICES OF :
RHODE ISLAND, INC. :

vs. :

C.A. No: PC-2017-3856

ST. JOSEPHS HEALTH SERVICES OF :
RHODE ISLAND RETIREMENT PLAN, :
as amended :

**RECEIVER'S MOTION TO ADJUDGE PROSPECT CHARTERCARE, LLC IN
CONTEMPT FOR WILLFUL FAILURE TO COMPLY WITH SUBPOENA AND
DELIBERATE INTERFERENCE WITH THE RECEIVER'S COLLECTION OF THE
ASSETS OF THE RECEIVERSHIP ESTATE**

Receiver Stephen F. Del Sesto, Esq., Permanent Receiver of the Receivership
Estate, hereby moves to adjudge Prospect CharterCARE, LLC in contempt of court.

Receiver relies in support on the memorandum of law filed herewith.

Receiver,

Stephen F. Del Sesto, Esq., Permanent
Receiver of the Receivership Estate,
By his Attorneys,

/s/ Max Wistow

Max Wistow, Esq. (#0330)
Stephen P. Sheehan, Esq. (#4030)
Benjamin Ledsham, Esq. (#7956)
Wistow, Sheehan & Loveley, PC
61 Weybosset Street
Providence, RI 02903
(401) 831-2700
(401) 272-9752 (fax)
mwistow@wistbar.com
spsheehan@wistbar.com
bledsham@wistbar.com

Dated: October 23, 2018

CERTIFICATE OF SERVICE

I hereby certify that, on the 23rd day of October, 2018, I filed and served the foregoing document through the electronic filing system on the following users of record:

Stephen F. Del Sesto, Esq.
Pierce Atwood LLP
One Financial Plaza, 26th Floor
Providence, RI 02903
sdelsesto@pierceatwood.com

Rebecca Tedford Partington, Esq.
Jessica D. Rider, Esq.
Sean Lyness, Esq.
Neil F.X. Kelly, Esq.
Maria R. Lenz, Esq.
Lauren S. Zurier, Esq.
Office of the Attorney General
150 South Main Street
Providence, RI 02903
rpartington@riag.ri.gov
jrider@riag.ri.gov
slyness@riag.ri.gov
nkelly@riag.ri.gov
mlenz@riag.ri.gov
lzurier@riag.ri.gov

Richard J. Land, Esq.
Robert D. Fine, Esq.
Chace Ruttenberg & Freedman, LLP
One Park Row, Suite 300
Providence, RI 02903
rland@crfillp.com
rfine@crfillp.com

Christopher Callaci, Esq.
United Nurses & Allied Professionals
375 Branch Avenue
Providence, RI 02903
ccallaci@unap.org

Arlene Violet, Esq.
499 County Road
Barrington, RI 02806
genvio@aol.com

Robert Senville, Esq.
128 Dorrance Street, Suite 400
Providence, RI 02903
robert.senville@gmail.com

Elizabeth Wiens, Esq.
Gursky Wiens Attorneys at Law
1130 Ten Rod Road, Suite C207
North Kingstown, RI 02852
ewiens@rilaborlaw.com

Jeffrey W. Kasle, Esq.
Olenn & Penza
530 Greenwich Avenue
Warwick, RI 02886
jwk@olenn-penza.com

George E. Lieberman, Esq.
Gianfrancesco & Friedmann
214 Broadway
Providence, RI 02903
george@gianfrancescolaw.com

Howard Merten, Esq.
Partridge Snow & Hahn LLP
40 Westminster Street, Suite 1100
Providence, RI 02903
hm@psh.com

Joseph V. Cavanagh, III, Esq.
Blish & Cavanagh, LLP
30 Exchange Terrace
Providence, RI 02903
jvc3@blishcavlaw.com

David A. Wollin, Esq.
Christine E. Dieter, Esq.
Hinckley Allen & Snyder, LLP
100 Westminster Street, Suite 1500
Providence, RI 02903-2319
dwoillin@hinckleyallen.com
cdieter@hinckleyallen.com

Stephen Morris, Esq.
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908
stephen.morris@ohhs.ri.gov

Scott F. Bielecki, Esq.
Cameron & Mittleman, LLP
301 Promenade Street
Providence, RI 02908
sbielecki@cm-law.com

Ekwan Rhow, Esq.
Bird, Marella, Boxer, Wolpert Nessim,
Drooks, Licenberg & Rhow, P.C.
1875 Century Park East, 23rd Floor
Los Angeles, CA 90067-2561
erhow@birdmarella.com

William M. Dolan, III, Esq.
Adler Pollock & Sheehan P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
wdolan@apslaw.com

Preston W. Halperin, Esq.
James G. Atchison, Esq.
Christopher J. Fragomeni, Esq.
Shechtman Halperin Savage, LLP
1080 Main Street
Pawtucket, RI 02860
phalperin@shslawfirm.com
jatchison@shslawfirm.com
jfragomeni@shslawfirm.com

Andrew R. Dennington, Esq.
Conn Kavanagh Rosenthal Peisch & Ford
One Federal Street, 15th Floor
Boston, MA 02110
adennington@connkavanagh.com

Steven J. Boyajian, Esq.
Robinson & Cole LLP
One Financial Plaza, Suite 1430
Providence, RI 02903
sboyajian@rc.com

W. Mark Russo, Esq.
Ferrucci Russo P.C.
55 Pine Street, 4th Floor
Providence, RI 02903
mrusso@frlawri.com

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/s/ Max Wistow