

HEARING DATE: OCTOBER 25, 2018, 9:30 A.M. (STERN, J.)

STATE OF RHODE ISLAND
PROVIDENCE, S.C.

SUPERIOR COURT

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

vs. :

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

ST. JOSEPH HEALTH SERVICES OF :
RHODE ISLAND RETIREMENT PLAN, :
As Amended :

**PROSPECT CHARTERCARE, LLC'S OBJECTION TO RECEIVER'S MOTION TO
ADJUDGE IT IN CONTEMPT OF COURT**

For the reasons set forth in the accompanying memorandum of law, Prospect CharterCare, LLC objects to Receiver Stephen F. Del Sesto, Esq.'s Motion to Adjudge Prospect CharterCare, LLC in Contempt of Court.

PROSPECT CHARTERCARE, LLC,

By its attorneys,

/s/ Joseph V. Cavanagh, III
Joseph V. Cavanagh, Jr. #1139
Joseph V. Cavanagh, III #6907
Blish & Cavanagh LLP
30 Exchange Terrace
Providence, RI 02903
ph: 401-831-8900
fax: 401-751-7542
jvc@blishcavlaw.com
jvc3@blishcavlaw.com
lbd@blishcavlaw.com

/s/ W. Mark Russo
W. Mark Russo (#3937)
Ferrucci Russo P.C.
55 Pine Street, 3rd Floor
Providence, RI 02903
Tel.: (401) 455-1000
mrusso@frlawri.com

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October, 2018, the within document was electronically filed through the Rhode Island Superior Court Case Management System by means of the EFS and is available for downloading by all counsel of record.

/s/ W. Mark Russo