#### HEARING DATE: OCTOBER 10, 2018 BUSINESS CALENDAR

# STATE OF RHODE ISLAND PROVIDENCE, S.C.

### SUPERIOR COURT

ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND, INC.	) ) )
v.	)))
ST. JOSEPHS HEALTH SERVICES OF RHODE ISLAND RETIREMENT PLAN, as amended	)))))

C.A. No. PC-2017-3856

## JOINT OBJECTION OF PROSPECT MEDICAL HOLDINGS, INC., PROSPECT EAST MEDICAL HOLDINGS, INC., PROSPECT CHARTERCARE, LLC, PROSPECT CHARTERCARE SJHSRI, LLC AND PROSPECT CHARTERCARE RWMC, LLC TO <u>RECEIVER'S PETITION FOR SETTLEMENT INSTRUCTIONS</u>

NOW COME Prospect Medical Holdings, Inc., Prospect East Medical Holdings, Inc.,

Prospect Chartercare, LLC, Prospect Chartercare SJHSRI, LLC, and Prospect Chartercare

RWMC (collectively, the "Prospect Entities"), by and through their attorneys, and hereby object

to the Receiver's Petition for Settlement Instructions ("Petition for Instructions"). In support

hereof, the Prospect Entities submit a memorandum of law filed contemporaneously herewith.

[SIGNATURE PAGE TO FOLLOW]

Case Number: PC-2017-3856 Filed in Providence/Bristol County Superior Court Submitted: 9/27/2018 4:34 PM Envelope: 1734007 Reviewer: Sharon S.

Respectfully Submitted,

PROSPECT MEDICAL HOLDINGS, INC. AND PROSPECT EAST HOLDINGS, INC. By their Attorneys,

/s/ Preston W. Halperin /s/ Dean J. Wagner /s/ Christopher J. Fragomeni Preston W. Halperin, Esq. (#5555) Dean J. Wagner, Esq. (#5426) Christopher J. Fragomeni, Esq. (#9476) Shechtman Halperin Savage LLP 1080 Main Street Pawtucket, RI 02860 Telephone: (401) 272-1400 phalperin@shslawfirm.com dwagner@shslawfirm.com cfragomeni@shslawfirm.com

Prospect CharterCare, LLC, PROSPECT CHARTERCARE SJHSRI, AND PROSPECT CHARTERCARE RWMC, By their attorneys,

<u>/s/ Joseph V. Cavanagh</u>, III, Esq. Joseph V. Cavanagh, Jr., Esq. (#1139) Joseph V. Cavanagh, III, Esq. (#6907) Blish & Cavanagh LLP 30 Exchange Terrace Providence, RI 02903 401-831-8900 401-751-7542 jvc3@blishcavlaw.com jvc@blishcavlaw.com

September 27, 2018

Case Number: PC-2017-3856 Filed in Providence/Bristol County Superior Court Submitted: 9/27/2018 4:34 PM Envelope: 1734007 Reviewer: Sharon S.

### **CERTIFICATE OF SERVICE**

I hereby certify that, on the 27<sup>th</sup> day of September 2018:

**Robert.Senville@gmail.comm** 

X I filed and served this document through the electronic filing system on the following parties:

Max Wistow, Esq. Joseph V. Cavanagh, III, Esq. Stephen P. Sheehan, Esq. Joseph V. Cavanagh, Jr., Esq. Wistow, Sheehan & Loveley, PC. **Blish & Cavanagh LLP 61 Weybosset Street 30 Exchange Terrace** Providence, RI 02903 Providence, RI 02903 spsheehan@wistbar.com jvc3@blishcavlaw.com mwistow@wistbar.com jvc@blishcavlaw.com Stephen DelSesto, Esq. **Richard J. Land, Esq.** Sdelsesto@pierceatwood.com rland@crfllp.com **Christopher Callaci** George Lieberman, Esq. George@gianfinancescolaw.com ccallaci@unap.org **Robert Senville, Esq.** Arlene Violet, Esq.

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At the following address \_\_\_\_\_

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<u>/s/\_Allison Y. Charette</u>

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