

**HEARING: JANUARY 18, 2019; 9:30 A.M.**

STATE OF RHODE ISLAND  
PROVIDENCE, S.C.

SUPERIOR COURT

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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. )  
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**PROSPECT MEDICAL HOLDINGS, INC., PROSPECT EAST HOLDINGS, INC., AND  
PROSPECT CHARTERCARE, LLC'S NOTICE OF INTENT TO SUE CHARTERCARE  
COMMUNITY BOARD, OR IN THE ALTERNATIVE, MOTION FOR RELIEF FROM  
THE INJUNCTIVE PROVISIONS OF THE PERMANENT RECEIVERSHIP ORDER**

NOW COME Prospect Medical Holdings, Inc., Prospect East Holdings, Inc., and Prospect Chartercare, LLC (collectively, "Prospect Entities"), by and through their attorneys, and hereby provide the Court with notice of their intent to sue Chartercare Community Board, or in the alternative, seek relief from the injunctive provisions of the permanent receivership Order entered on October 27, 2017. In support hereof, the Prospect Entities submit a memorandum of law filed contemporaneously herewith.

[Signature page to follow]

PROSPECT MEDICAL HOLDINGS, INC., AND  
PROSPECT EAST HOLDINGS, INC.

*/s/ Preston W. Halperin*

*/s/ Dean J. Wagner*

*/s/ Christopher J. Fragomeni*

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PROSPECT CHARTERCARE, LLC,

By its attorneys,

*/s/ Joseph Cavanagh, Jr.*

*/s/ Joseph Cavanagh, III*

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*/s/ W. Mark Russo*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of January, 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/ Christopher J. Fragomeni, Esq.