

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

CHARTERCARE COMMUNITY BOARD, :

Plaintiff, :

v. :

C.A. No. PC-2019-3654

SAMUEL LEE, ET AL., :

Defendants. :

PROSPECT ENTITIES' MOTION FOR PROTECTIVE ORDER

NOW COME the Prospect Entities,¹ pursuant to Rule 26(c) of the Superior Court Rules of Civil Procedure, and hereby respectfully request that the Court enter a protective order relative to the production of certain documents more fully described in the memorandum of law filed contemporaneously herewith. For the reasons set forth in the memorandum of law, the Court should grant this Motion for Protective Order.

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

PROSPECT CHARTERCARE, LLC,
PROSPECT CHARTERCARE SJHSRI, LLC,
PROSPECT CHARTERCARE RWMC, LLC,

By their attorneys,

By their attorneys,

/s/ Christopher J. Fragomeni

Christopher J. Fragomeni, Esq. (#9476)
SHECHTMAN HALPERIN SAVAGE LLP
1080 Main Street, Pawtucket, RI 02860
T: (401) 272-1400 | F: (401) 272-1400
cfragomeni@shslawfirm.com

/s/ W. Mark Russo

W. Mark Russo, Esq. (#3937)
FERRUCCI RUSSO P.C
55 Pine Street, 3rd Fl., Providence, RI 02903
T: (401) 455-1000
mrusso@frlawri.com

¹ The Prospect Entities include Prospect Medical Holdings, Inc., Prospect East Holdings, Inc., Prospect Advisory Services, LLC, Prospect Chartercare, LLC, Prospect Chartercare SJHSRI, LLC, and Prospect Chartercare RWMC, LLC.

CERTIFICATION

The undersigned certifies that he has, in good faith, conferred with opposing counsel in an effort to resolve this dispute without court intervention.

/s/ Christopher J. Fragomeni _____

CERTIFICATE OF SERVICE

I certify that on the 27th day of November 2020, the within document was electronically filed and electronically served through the Rhode Island Judiciary Electronic Filing System, on all counsel of record and those parties registered to receive electronic service in this matter. The document is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Christopher J. Fragomeni _____