

**HEARING DATE: NOVEMBER 2, 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 PCLLC IN CONTEMPT FOR WILLFUL  
FAILURE TO COMPLY WITH SUBPOENA AND DELIBERATE  
INTERFERENCE WITH THE RECEIVER'S COLLECTION OF THE ASSETS  
OF THE RECEIVERSHIP ESTATE**

For the reasons set forth in the accompanying memorandum of law, Prospect CharterCARE, LLC objects to the Receiver's Motion to Adjudge PCLLC in Contempt for Willful Failure to Comply With Subpoena and Deliberate Interference With the Receiver's Collection of the Assets of the Receivership Estate.

PROSPECT CHARTERCARE, LLC,

By its attorneys,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th 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/ Joseph V. Cavanagh, III