

STATE OF RHODE ISLAND  
PROVIDENCE, SC

SUPERIOR COURT

\_\_\_\_\_  
ST. JOSEPH HEALTH SERVICES )  
OF RHODE ISLAND )

v. )

ST. JOSEPH HEALTH SERVICES )  
OF RHODE ISLAND RETIREMENT )  
PLAN, as amended )  
\_\_\_\_\_

C.A. No. PC-2017-3856

**OBJECTION OF PROSPECT MEDICAL HOLDINGS, INC., PROSPECT EAST HOLDINGS, INC., AND PROSPECT CHARTERCARE, LLC TO RECEIVER'S PROPOSED ORDER REGARDING PETITION FOR SETTLEMENT INSTRUCTIONS**

NOW COMES Prospect Medical Holdings, Inc.; Prospect East Holdings, Inc.; and Prospect Chartercare, LLC (collectively, "Prospect Entities"), and pursuant to Super. Ct. R. Civ. P. 77(f), hereby object to the proposed order submitted by the Receiver's Special Counsel on November 2, 2018 ("Proposed Order"). The Prospect Entities will draft and submit a proposed order within four days of the filing of the Proposed Order consistent with Super. R. Civ. P. 77(f).

Respectfully Submitted,

Prospect Medical Holdings, Inc. and  
Prospect East Holdings, Inc.  
By its Attorneys,

/s/ Preston W. Halperin

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](mailto:phalperin@shslawfirm.com)

[dwagner@shslawfirm.com](mailto:dwagner@shslawfirm.com)

[cfragomeni@shslawfirm.com](mailto:cfragomeni@shslawfirm.com)

Prospect CharterCare, LLC,

By its attorneys,

/s/ Joseph V. Cavanagh, 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](mailto:jvc3@blishcavlaw.com)  
[jvc@blishcavlaw.com](mailto:jvc@blishcavlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that, on the 2<sup>nd</sup> day of November 2018:

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

**Max Wistow, Esq.**  
**Stephen P. Sheehan, Esq.**  
**Wistow, Sheehan & Loveley, PC.**  
**61 Weybosset Street**  
**Providence, RI 02903**  
[spsheehan@wistbar.com](mailto:spsheehan@wistbar.com)  
[mwistow@wistbar.com](mailto:mwistow@wistbar.com)

**Joseph V. Cavanagh, III, Esq.**  
**Joseph V. Cavanagh, Jr., Esq.**  
**Blish & Cavanagh LLP**  
**30 Exchange Terrace**  
**Providence, RI 02903**  
[jvc3@blishcavlaw.com](mailto:jvc3@blishcavlaw.com)  
[jvc@blishcavlaw.com](mailto:jvc@blishcavlaw.com)

**Stephen DelSesto, Esq.**  
[Sdelsesto@pierceatwood.com](mailto:Sdelsesto@pierceatwood.com)

**Richard J. Land, Esq.**  
[rland@crfillp.com](mailto:rland@crfillp.com)

**George Lieberman, Esq.**  
[George@gianfinancescolaw.com](mailto:George@gianfinancescolaw.com)

**Christopher Callaci**  
[ccallaci@unap.org](mailto:ccallaci@unap.org)

**Robert Senville, Esq.**  
[Robert.Senville@gmail.com](mailto:Robert.Senville@gmail.com)

**Arlene Violet, Esq.**  
[genivo@aol.com](mailto:genivo@aol.com)

---

The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

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

The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

I mailed or  hand-delivered this document to the attorney for the opposing party and/or the opposing party if self-represented, whose name is: \_\_\_\_\_

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

(Please note that you will not receive notifications through the Rhode Island Judiciary's Electronic Filing System unless you are linked as a "Service Contact" to each individual matter)

/s/ Allison Y. Charette

Case Number: PC-2017-3856  
Filed in Providence/Bristol County Superior Court  
Submitted: 11/2/2018 4:32 PM  
Envelope: 1784973  
Reviewer: Sharon S.