

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

CHARTERCARE COMMUNITY BOARD
et al.,

Plaintiffs

v.

SAMUEL LEE et al.,

Defendants

**Hearing Date: Dec. 16, 2020
@ 11:00 a.m.**

C.A. No. PC-2019-3654

**PLAINTIFFS' OBJECTION TO THE PROSPECT ENTITIES'
MOTION FOR A PROTECTIVE ORDER**

Plaintiff CharterCARE Community Board (through Thomas Hemmendinger, Liquidating Receiver of CharterCARE Community Board, St. Joseph Health Services of Rhode Island, and Roger Williams Hospital) and Plaintiff Stephen Del Sesto Stephen Del Sesto (as Receiver for the St. Joseph Health Services of Rhode Island Retirement Plan) (collectively the "Receivers") hereby object to the Motion for Protective Order filed by Prospect Medical Holdings, Inc., Prospect East Holdings, Inc., Prospect Advisory Services, LLC, Prospect Chartercare, LLC, Prospect Chartercare SJHSRI, LLC, and Prospect Chartercare RWMC, LLC.. The Receivers rely in support on their Memorandum of Law filed herewith.

Respectfully submitted,

Stephen Del Sesto, as Receiver and
Administrator of the St. Joseph Health
Services of Rhode Island Retirement
Plan,

By His Attorneys,
WISTOW, SHEEHAN & LOVELEY, PC

/s/ Max Wistow

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December 13, 2020

CharterCARE Community Board,
individually and derivatively, as nominal
member and as trustee of the beneficial
interest of its membership in Prospect
CharterCARE, LLC,

By Its Attorneys,

/s/ Thomas S. Hemmendinger

Thomas S. Hemmendinger (#3122)
Permanent Liquidating Receiver of
CharterCARE Community Board, Roger
Williams Hospital, and St. Joseph Health
Services of Rhode Island
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CERTIFICATE OF SERVICE

I hereby certify that, on the 13th day of December, 2020, I filed and served the foregoing document through the electronic filing system on the following users of record:

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/s/ Benjamin Ledsham