

Hearing Date: October 15, 2021 @ 9:30 a.m.

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

In re:

CharterCARE Community Board,

St. Joseph Health Services of
Rhode Island,

And

Roger Williams Hospital

PC-2019-11756

**LIQUIDATING RECEIVER AND PLAN RECEIVER'S
MOTION TO ENFORCE SUBPOENA DUCES TECUM
AGAINST THE BEACON MUTUAL INSURANCE COMPANY**

Thomas S. Hemmendinger as Liquidating Receiver of CharterCARE Community Board, St. Joseph Health Services of Rhode Island, and Roger Williams Hospital, and Stephen Del Sesto as Receiver of the St. Joseph Health Services of Rhode Island Retirement Plan, hereby move to enforce the Liquidating Receiver's subpoena duces tecum against The Beacon Mutual Insurance Company.

Movants rely upon the memorandum of law submitted herewith.

Respectfully submitted,

Stephen Del Sesto as Receiver of the St.
Joseph Health Services of Rhode Island
Retirement Plan,
By his Attorney,

/s/ Max Wistow

Max Wistow, Esq. (#0330)
Stephen P. Sheehan, Esq. (#4030)
Benjamin Ledsham, Esq. (#7956)
WISTOW, SHEEHAN & LOVELEY, PC
61 Weybosset Street
Providence, RI 02903
401-831-2700 (tel.)
mwistow@wistbar.com
spsheehan@wistbar.com
bledsham@wistbar.com

and

Thomas S. Hemmendinger, as Liquidating
Receiver of CharterCARE Community Board,
St. Joseph Health Services of Rhode Island,
and
Roger Williams Hospital

/s/ Thomas Hemmendinger

Thomas S. Hemmendinger, Esq. (#3122)
Brennan, Recupero, Cascione,
Scungio & McAllister, LLP
362 Broadway
Providence, RI 02909
Tel. (401) 453-2300
Fax (401) 453-2345
themmendinger@brcsm.com

Dated: September 28, 2021

CERTIFICATE OF SERVICE

I hereby certify that, on the 28th day of September, 2021, I filed and served the foregoing document through the electronic filing system on the following users of record:

Thomas S. Hemmendinger, Esq.
Sean J. Clough, Esq.
Lisa M. Kresge, Esq.
Ronald F. Cascione, Esq.
Brennan, Recupero, Cascione, Scungio &
McAllister, LLP
362 Broadway
Providence, RI 02909
themmendinger@brscm.com
sclough@brscm.com
lkresge@brscm.com
rcascione@brscm.com

Jessica Rider, Esq.
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
jrider@riag.ri.gov

John A. Tarantino, Esq.
Patricia K. Rocha, Esq.
Joseph Avanzato, Esq.
Leslie D. Parker, Esq.
Adler Pollock & Sheehan PC
One Citizens Plaza, 8th Floor
Providence, RI 02903
jtaranino@apslaw.com
procha@apslaw.com
javanzato@apslaw.com
lparker@apslaw.com

Steven J. Boyajian, Esq.
Robinson & Cole LLP
One Financial Plaza, Suite 1430
Providence, RI 02903
sboyajian@rc.com

Giovanna La Terra Bellina, Esq.
144 Wayland Square
Providence, RI 02906
jlaterra@orsonandbrusini.com

Preston Halperin, Esq.
Christopher J. Fragomeni, Esq.
Douglas Giron, Esq.
Savage Law Partners
564 South Water Street
Providence, RI 02903
phalperin@shslawfirm.com
chris@savagelawpartners.com
dgiron@savagelawpartners.com
epare@savagelawpartners.com

Patricia Antonelli, Esq.
Salter McGowan Sylvia & Leonard, Inc
56 Exchange Street, Suite 500
Providence, RI 02903
pantonelli@smsllaw.com

Stacey Nakasian, Esq.
Duffy & Sweeney, LTD
321 South Main Street, 4th Floor
Providence, RI 02903
snakasian@duffysweeney.com

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

/s/ Benjamin Ledsham