Electronically Served: 9/3/2021 2:18 PM Location: Providence/Bristol County Superior Court Case Number: PC-2019-11756

STATE OF RHODE ISLAND PROVIDENCE, SC.

SUPERIOR COURT

In re:

in i.e.

CHARTERCARE COMMUNITY BOARD,

ST. JOSEPH HEALTH SERVICES OF : C.A. NO: PC-2019-11756

RHODE ISLAND

AND

ROGER WILLIAMS HOSPITAL

## **OBJECTION**

The Beacon Mutual Insurance Company ("Beacon Mutual"), pursuant to Superior Court Rule of Civil Procedure 45(c)(2)(B), hereby objects to the Subpoena dated August 6, 2021 issued by the Liquidating Receiver to Beacon Mutual. As grounds for its objection, Beacon Mutual states that that the document requests contained in the Subpoena are vague and overbroad, seek information previously produced by Beacon Mutual to the Liquidating Receiver or that already is in the Liquidating Receiver's possession, and impose undue burden and expense on Beacon Mutual.

Respectfully submitted,

The Beacon Mutual Insurance Company,

By its Attorney,

/s/ Stacey P. Nakasian

Stacey P. Nakasian, Esq. (#5069) snakasian@duffysweeney.com Duffy & Sweeney, LTD 321 South Main Street, 4<sup>th</sup> Floor Providence, RI 02903 (401) 455-0700 (401) 455-0701 facsimile

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>RD</sup> day of September 2021, a copy of the foregoing document was served through the Rhode Island ECF system and will be sent electronically to the counsel who are registered participants identified on the Notice of Electronic Filing

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

/s/ Michelle Potts