

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STEPHEN DEL SESTO, AS RECEIVER
AND ADMINISTRATOR OF THE ST.
JOSEPH HEALTH SERVICES OF RHODE
ISLAND RETIREMENT PLAN et al.,

Plaintiffs,

v.

PROSPECT CHARTERCARE, LLC et al.,

Defendants.

C.A. No. 1:18-CV-00328-WES-LDA

**JOINT MOTION FOR ENTRY OF STIPULATION AND
PROPOSED ORDER EXTENDING BRIEFING DEADLINES**

Plaintiff Stephen Del Sesto (the “Receiver”) and the individual named plaintiffs (individually and as putative class representatives) (with the Receiver, “Plaintiffs”) and Defendants Roman Catholic Bishop of Providence, a corporation sole, Diocesan Administration Corporation, and Diocesan Service Corporation (collectively, the “Diocesan Defendants”) move for entry of the stipulation and proposed order attached at Exhibit A, extending all deadlines in the Court’s March 24, 2022 order, ECF No. 240, by one week. In support thereof, the Parties state:

1. Plaintiffs require the assistance of their counsel Stephen P. Sheehan.
2. As previously noted Attorney Sheehan has been attending to family medical issues and needs and has been unable to devote the necessary time to this matter.
3. Plaintiffs believe no additional time will be required.
4. The requested extension of all deadlines will not result in prejudice to any party.

Wherefore, the Parties respectfully request the entry of the attached stipulation and proposed order extending the deadlines in the Court’s March 24, order as follows: (A) Plaintiffs’

shall file their motion papers on or before April 18, 2022; (B) the Diocesan Defendants' reply is due on or before May 2, 2022.

Dated: April 7, 2022

ROMAN CATHOLIC BISHOP OF
PROVIDENCE, A CORPORATION SOLE,
DIOCESAN ADMINISTRATION
CORPORATION and DIOCESAN SERVICE
CORPORATION

By Their Attorneys,

PARTRIDGE SNOW & HAHN LLP

Respectfully Submitted,

STEPHEN DEL SESTO, AS RECEIVER
AND ADMINISTRATOR OF THE ST.
JOSEPH HEALTH SERVICES OF RHODE
ISLAND RETIREMENT PLAN, et al.

By Their Attorneys,

WISTOW, SHEEHAN & LOVELEY, PC

/s/ Howard Merten

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Eugene G. Bernardo (#6006)
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/s/ Stephen P. Sheehan

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on April 7, 2022.

/s/ Stephen P. Sheehan

EXHIBIT A

**UNITED STATES DISTRICT COURT
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JOSEPH HEALTH SERVICES OF RHODE
ISLAND RETIREMENT PLAN et al.,

Plaintiffs

v.

PROSPECT CHARTERCARE, LLC et al.,

Defendants

C.A. No. 1:18-CV-00328-WES-LDA

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF BRIEFING DEADLINES**

Plaintiff Stephen Del Sesto (the “Receiver”) and the individual named plaintiffs (individually and as putative class representatives) (with the Receiver, “Plaintiffs”) and Defendants Roman Catholic Bishop of Providence, a corporation sole, Diocesan Administration Corporation, and Diocesan Service Corporation (collectively, the “Diocesan Defendants”) stipulate and agree to the extension of the deadlines set out in the Court’s March 24, 2022 order, ECF No. 240, as follows:

1. Plaintiffs shall file their opposition to the Diocesan Defendants’ motion to dismiss and motion for summary judgment on or before April 18, 2022.
2. The Diocesan Defendants’ reply is due on or before May 2, 2022.

IT IS SO ORDERED:

Hon. William E. Smith
Chief United States District Judge

Dated: April __, 2022

So stipulated:

ROMAN CATHOLIC BISHOP OF
PROVIDENCE, A CORPORATION SOLE,
DIOCESAN ADMINISTRATION
CORPORATION and DIOCESAN SERVICE
CORPORATION

By Their Attorneys,

PARTRIDGE SNOW & HAHN LLP

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