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

PROSPECT CHARTERCARE, LLC, ET AL.

Defendants.

DECLARATION OF ROBERT D. FINE, ESQ. REGARDING NOTICE OF PROPOSED SETTLEMENT PURSUANT TO 28 U.S.C. S 1715 ON BEHALF OF CHARTERCARE COMMUNITY BOARD

Robert D. Fine hereby declares and states as follows:

- 1. I have personal knowledge of the matters stated herein, and if called to testify as a witness, I could and would testify competently to the following facts.
- 2. I am an attorney with the law firm of Chace Ruttenberg & Freedman, LLP, which serves as counsel for Defendant CharterCARE Community Board ("CCCB") in the above-captioned action.
- 3. I submit this declaration upon personal knowledge to demonstrate CCCB'S compliance with the notice requirements of the Class Action Fairness Act of 2005, 28 U.S.C. §1715 ("CAFA").
- 4. On November 21, 2018, Plaintiffs and Defendants CCCB, St. Joseph Health Services of Rhode Island ("SJHSRI"), and Roger Williams Hospital ("RWH") (collectively the "Settling Parties") filed their Joint Motion for Preliminary Approval of Partial Settlement.

- 5. On June 6, 2019, this Court signed a Memorandum and Order preliminarily approving the proposed class action settlement between the Settling Parties in the above-captioned action.
- 6. On December 3, 2018, pursuant to 28 U.S.C. §1715 (a) & (b), Chace Ruttenberg & Freedman, LLP employees, acting under my direction and supervision, caused the service of the CAFA Notice, which consisted of a cover letter and certain accompanying documents, upon the U.S. Attorney General and the appropriate government officials for all of the states in which proposed members of the Settlement Class reside, based on information provided to me by Attorney Stephen Del Sesto as Receiver and Administrator for the St. Joseph Health Services of Rhode Island Retirement Plan, by mail using the United States Postal Service First Class Mail.
- 7. On June 26, 2019, Chace Ruttenberg & Freedman, LLP employees, acting under my direction and supervision, in accordance with the Court's Memorandum and Order of June 6, 2019, caused the service of the Class Notice upon the U.S. Attorney General and the appropriate government officials referred to in paragraph 6, by mail using the United States Postal Service First Class Mail.
- 8. Attached hereto as Exhibit A is a true and correct copy of the letter that was mailed as described in paragraph 6.
- 9. Attached hereto as Exhibit B is the list of names and addresses of the government officials upon whom the CAFA Notice and the Class Notice were served as described in paragraphs 6 and 7.
- 10. Attached hereto as Exhibit C is a true and correct copy of the cover letter enclosing the Class Notice that was mailed as described in paragraph 7.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2d of July, 2019 in Providence, Rhode Island.

Robert D. Fine

Chace Ruttenberg & Freedman, LLP

Attorneys at Law

Robert B. Berkelhammer\*\* Nathan W. Chace Douglas J. Emanuel\*\* Robert D. Fine\* Carl I. Freedman Macrina G. Hieroe\*\* Bret W. Jedele Drew P. Kaplan Richard J. Land\* Allan M. Shine\* Don E. Wincberg\*

Paul T. Cotter\* LuAnn Cserr\*<sup>#</sup> Andre S. Digou\*

Bruce R. Ruttenberg, refred

- Alon admitted to Maccachi unite
- Also admitted in Connecticut Also admitted in New York
- Also admitted in Washington, D.C.
- Admitted in California
- Admitted U.S. Patent & Trademark Office

December 3, 2018

#### VIA FIRST CLASS MAIL

Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001

Re: Stephen Del Sesto et al. v. PROSPECT CHARTERCARE, LLC, et al., C.A. No: 1:18-CV-00328-WES-LDA (D.R.I.)

Dear Sir or Madam:

Pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715, St. Joseph Health Services of Rhode Island ("SJHSRI") hereby provides this notice of its proposed class action settlement in the above-referenced matter currently pending in the U.S. District Court for the District of Rhode Island.

A motion for preliminary approval of the proposed settlement was filed with the court on November 21, 2018. In compliance with 28 U.S.C. §§ 1715(b)(1), (3) (4), (8), please find enclosed, copies of the following documents:

- Complaint, filed June 18, 2018 [Exhibit 1]; 1.
- Amended Complaint filed October 5, 2018 [Exhibit 2]; 2.
- Settlement Agreement entered into as of August 31, 2018, with Exhibits, 3. including the proposed class notice [Exhibit 3];

CR&F

4. Class participant list for your state [Exhibit 4]; and

5. Decision of Hon. Brian Stern, Justice Rhode Island Superior Court, dated October 29, 2018 [Exhibit 5].

With regard to 28 U.S.C. § 1715(b)(2), a fairness hearing regarding SJHSRI's settlement has not yet been scheduled.

With regard to 28 USC § 1715(b)(5), there has been no other settlement of agreement contemporaneously made between class counsel and counsel for SJHSRI.

With regard to USC § 1715(b)(6) and (8), there has been no final judgment or notice of dismissal yet filed relating to SJHSRI's proposed settlement.

With regard to 28 U.S.C. § 1715(b)(7), SJHSRI cannot provide the "estimated proportionate share of the claims of such members to the entire settlement," 28 U.S.C. §§ 1715(b)(7)(A), 1715(b)(7)(B), because the settlement will be paid into the St. Joseph Health Services of Rhode Island Retirement Plan, not distributed to individual class members. Moreover, the final amount of the settlement has not yet been determined, as it depends on subsequent collection efforts by Plaintiffs and Plaintiffs' Counsel.

For your information, all of the filings in this proceeding and related cases are available at the Receiver's website: <a href="https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan">https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan</a>.

Please contact the undersigned if you have any questions about this notice or require additional information.

Sincerely,

Robert D. Fine

**Enclosures** 

Office of the Attorney General Office of the Attorney General	vermont Attorney General 's Office Office of the Attorney General Office of the Attorney General	Office of the Attorney General Attorney General Alan Wilson Office of the Attorney General Office of the Attorney General Office of the Attorney General and Reporter Office of the Attorney General Utah State Capitol Office Mailing Address	Office of the Attorney General Attorney General's Office Office of the Attorney General Ohio Attorney General Mike DeWine Oklahoma Office of the Oklahoma Attorney General Attorney General	Office of the Attorney General Office of Minnesota Attorney General MS Attorney General's Office Missouri Attorney General's Office Office of the Attorney General's Office Office of the Attorney General Office Office of the Attorney General NH Department of Justice Office of the Attorney General	Office of the Indiana Attorney General Office of the Attorney General of Iowa Kansas Attorney General Office of the Attorney General	Office of the Attorney General Office of the Attorney General for the District of Columbia Delaware Department of Justice Office of Attorney General Office of the Attorney General Department of the Attorney General Idaho Office of the Attorney General Office of the Illinois Attorney General	Attorney General of the United States Office of the Attorney General Attorney General Jahna Lindemuth Office of the Arizona Attorney General Office of the Attorney General CAFA Coordinator Office of the Attorney Genera,
			The Capitol	O. Memen Williams Building RJ Hughes Justice Complex			Office of the Attorney General Colorado Department of Law
Kendrick Building	1125 Washington Street SE	Office of the Attorney General	Department of Law Department of Justice State Capitol  Oregon Department of Justice	State Capital, Suite 102  Supreme Court Building  2115 State Capitol  Gordon J. MacDonald, Attorney General 25 Market Street	Indiana Government Center South Hoover State Office Building	Carvel State Building State of Florida 700 W. Jefferson Street, Suite 210	U.S. Department of Justice  Consumer Law Section  Ralph L. Carr Judicial Building
P.O. Box 7/89 P.O. Box 7857 P.O. Box 7857 2320 Capitol Avenue	109 State Street 202 North Ninth Street PO Box 40100	Strawberry Square, 10th F1 150 South Main Street P.O. Box 11549 1302 E Hwy 14, Suite 1 P.O. Box 20207 P.O. Box 12548 PO Box 142320	Justic Building, 2nd Floor PO Box 629 600 E. Boulevard Avenue 30 E. Broad St., 14th Floor 313 NE 21st Street 1162 Court St. NE	PO Box 30212 75 Dr. Martin Luther King Boulevard P.O. Box 220 207 W. High St 215 N Sanders St PO Box 98920 100 North Carson Street 33 Capitol Street PO Box 080 PO Drawer 1508	302 W. Washington St., 5th Floor 1305 E. Walnut Street 120 SW 10th Ave., 2nd Floor 700 Capitol Avenue, Suite 118 Post Office Box 94095 6 State House Station 200 St. Paul Place 1 Ashburton Place	55 Elm Street, Ste. 1100S 441 4th Street, NW 820 N. French St The Capitol PL-01 40 Capitol Square, SW 425 Queen Street P.O. Box 83720 100 West Randolph Street	950 Pennsylvania Avenue, NW P.O. Box 300152 1031 West 4th Avenue, Suite 200 2005 N. Central Avenue 323 Center Street, Suite 200 455 Golden Gate Ave., Suite 11000 1300 Broadway, 10th Floor
Charleston, WV 35326 Madison, WI 53707-7857 Cheyenne, WY 82002	Montpelier, VT 05609 Richmond, VA 23219 Olympia, WA 98504-0100	Hartisburg, PA 1/120 Providence, Rhode Island 02903 Columbia, SC 29211 Pierre SD 57501-8501 Nashville, TN 37202-0207 Austin, TX 78711-2548 Salt Lake City, UT 84114-2320	Albany, NY 12224 Raleigh, NC 27602 Bismarck ND 58505 Columbus, OH 43215 Oklahoma City, OK 73105 Salem, OR 97301-4096	Lansing, MI 489-35  Jackson, MS 39205  Jefferson City, MO 65101  Helena, MT 59620  Lincoln, NE 68509  Carson City, NV 89701  Concord, NH 03301  Trenton, NJ 08625-0080  Santa Fe, NM 87504	Indianapolis, IN 46204 Des Moines IA 50319 Topeka, KS 66612 IFrankfort, KY 40601-3449 Baton Rouge, LA 70804 Augusta, ME 04333 Baltimore, MD 21202 Boston, MA 02108-1518	Hartford, CT 06106 Washington, DC 20001 Wilmington, DE 19801 Tallahassee, FL 32399-1050 Atlanta, Ga 30334 Honolulu, HI 96813 Boise, ID 83720-0010 Chicago, IL 60601	Washington, DC 20530-0001 Montgomery, AL 36130-0152 Anchorage, AK 99501 Phoenix, AZ 85004 Little Rock, AR 72201 San Francisco, CA 94102 Denver, CO 80203

June 26, 2019

VIA FIRST CLASS MAIL

Office of the Attorney General P.O. Box 300152 Montgomery, AL 36130-0152

Re: Stephen Del Sesto et al. v. Prospect Chartercare LLC, et al.,

C.A. No: 1:18-CV-00328-WES-LDA (D.R.I.)

Dear Sir or Madam:

This notice concerns a proposed class action settlement in the above-referenced matter currently pending in the U.S. District Court for the District of Rhode Island.

On December 3, 2018, CharterCARE Community Board, St. Joseph Health Services of Rhode Island and Roger Williams Hospital (collectively referred to herein as the "Settling Defendants") jointly provided notice of this proposed settlement to all appropriate state and federal officials pursuant to the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715.

Information concerning this proposed settlement, including copies of the Complaint, Amended Complaint, and a complete copy of the Settlement Agreement entered into as of August 31, 2018, is available at <a href="https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan">https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan</a>.

On June 6, 2019, the Honorable William E. Smith, Chief Judge of the U.S. District Court for the District of Rhode Island, issued an order granting preliminary approval of the proposed settlement (hereinafter, the "Order"). The Order is also available at the above web site. The Order states that Class Notice should be provided to appropriate state and federal officials pursuant to CAFA, if required. Although notice to you may not be required under CAFA, out of an abundance of caution, this notice is being sent to the appropriate state official of each state as well as the U.S. Attorney General. The Settling Defendants now provide your office with a copy of the enclosed Class Notice concerning the proposed settlement.

A final fairness hearing concerning the proposed settlement is scheduled to take place on September 10, 2019, at 10:00 am in Courtroom 2 of the United States District Court for the District of Rhode Island, One Exchange Terrace, Providence, Rhode Island, or at such other date and time later set by Court order.

Please contact me if you have any questions about this notice or require additional information.

Sincerely,

Robert D. Fine Chace Ruttenberg & Freedman, LLP One Park Row, Suite 300 Providence, RI 02903 (401) 453-6400

Counsel for the Settling Defendants

Enclosure

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

PROSPECT CHARTERCARE, LLC, ET AL.

Defendants.

DECLARATION OF ROBERT D. FINE, ESQ. REGARDING NOTICE OF PROPOSED SETTLEMENT PURSUANT TO 28 U.S.C. S 1715 ON BEHALF OF ROGER WILLIAMS HOSPITAL

Robert D. Fine hereby declares and states as follows:

- 1. I have personal knowledge of the matters stated herein, and if called to testify as a witness, I could and would testify competently to the following facts.
- 2. I am an attorney with the law firm of Chace Ruttenberg & Freedman, LLP, which serves as counsel for Defendant Roger Williams Hospital ("RWH") in the above-captioned action.
- 3. I submit this declaration upon personal knowledge to demonstrate RWH's compliance with the notice requirements of the Class Action Fairness Act of 2005, 28 U.S.C. §1715 ("CAFA").
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- 5. On June 6, 2019, this Court signed a Memorandum and Order preliminarily approving the proposed class action settlement between the Settling Parties in the above-captioned action.
- 6. On December 3, 2018, pursuant to 28 U.S.C. §1715 (a) & (b), Chace Ruttenberg & Freedman, LLP employees, acting under my direction and supervision, caused the service of the CAFA Notice, which consisted of a cover letter and certain accompanying documents, upon the U.S. Attorney General and the appropriate government officials for all of the states in which proposed members of the Settlement Class reside, based on information provided to me by Attorney Stephen Del Sesto as Receiver and Administrator for the St. Joseph Health Services of Rhode Island Retirement Plan, by mail using the United States Postal Service First Class Mail.
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2d of July, 2019 in Providence, Rhode Island.

Robert D. Fine

Meluta Fung

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Douglas J. Emanuel \*\*
Robert D. Fine\*
Carl f. Freedman
Macrina G. Hjerpe \*\*
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- \* Also admitted in Massachusetts \* Also admitted in Connecticut
- Also admitted in New York
  Also admitted in Washington, D.C.
- \* Admitted in California - Admitted U.S. Patent & Trademark Office

December 3, 2018

#### VIA FIRST CLASS MAIL

Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001

Re: Stephen Del Sesto et al. v. PROSPECT CHARTERCARE, LLC, et al., C.A. No: 1:18-CV-00328-WES-LDA (D.R.I.)

Dear Sir or Madam:

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CR&F

- 4. Class participant list for your state [Exhibit 4]; and
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With regard to 28 U.S.C. § 1715(b)(2), a fairness hearing regarding SJHSRI's settlement has not yet been scheduled.

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Please contact the undersigned if you have any questions about this notice or require additional information.

Sincerely,

Robert D. Fine

Enclosures

Wisconsin Department of Justice Office of the Attorney General	Office of the Attorney General Office of the Attorney General Office of the Attorney General	Office of the Attorney General and Reporter Office of the Attorney General Utah State Capitol Office Mailing Address Vermont Attorney General's Office	Attorney General Pennsylvania Office of Attorney General Office of the Attorney General Attorney General Alan Wilson Office of the Attorney General	Office of the Attorney General Attorney General's Office Office of the Attorney General Ohio Attorney General Mike DeWine Oklahoma Office of the Oklahoma Attorney General	Office of the Attorney General  NH Department of Justice Office of The Attorney General Office of the Attorney General	Office of the Attorney General Office of Minnesota Attorney General MS Attorney General's Office Missouri Attorney General's Office Office of the Attorney General Nebraska Attorney General's Office	Office of the Indiana Attorney General Office of the Attorney General of Iowa Kansas Attorney General Office of the Attorney General	Office of the Attorney General Office of the Attorney General for the District of Columbia Delaware Department of Justice Office of Attorney General Office of the Attorney General Department of the Attorney General Idaho Office of the Attorney General Office of the Illinois Attorney General	Attorney General of the United States Office of the Attorney General Attorney General Jahna Lindemuth Office of the Atizona Attorney General Office of the Attorney General CAFA Coordinator Office of the Attorney Genera,
				The Capitol	RJ Hughes Justice Complex	G. Mennen Williams Building			Office of the Attorney General Colorado Department of Law
Kendrick Building	1125 Washington Street SE	Office of the Attorney General	Oregon Department of Justice	Department of Law Department of Justice State Capitol	Gordon J. MacDonald, Attorney General 25 Market Street	525 W. Ottawa Street State Capital, Suite 102 Supreme Court Building 2115 State Capitol	Indiana Government Center South Hoover State Office Building	Carvel State Building State of Florida 700 W. Jefferson Street, Suite 210	U.S. Department of Justice  Consumer Law Section  Ralph L. Carr Judicial Building
P.O. Box 7857 2320 Capitol Avenue	202 North Ninth Street PO Box 40100 PO Box 1789	P.O. Box 20207 PO Box 12548 PO Box 142320 109 State Street	1162 Court St. NE 1162 Court St. NE Strawberry Square, 16th F1 150 South Main Street P.O. Box 11549 1302 E Hwy 14, Suite 1	Justic Building, 2nd Floor PO Box 629 600 E. Broulevard Avenue 30 E. Broad St., 14th Floor	100 North Carson Street 33 Capitol Street PO Box 080 PO Drawer 1508	PO Box 30212 75 Dr. Martin Luther King Boulevard P.O. Box 220 207 W. High St 215 N Sanders St PO Box 98920	302 W. Washington St., 5th Floor 1305 E. Walnut Street 120 SW 10th Ave., 2nd Floor 700 Capitol Avenue, Suite 118 Post Office Box 94095 6 State House Station 200 St. Paul Place 1 Ashburton Place	55 Elm Street, Ste. 1100S 441 4th Street, NW 820 N. French St The Capitol PL-01 40 Capitol Square, SW 425 Queen Street P.O. Box 83720 100 West Randolph Street	950 Pennsylvania Avenue, NW P.O. Box 300152 1031 West 4th Avenue, Suite 200 2005 N. Central Avenue 323 Center Street, Suite 200 455 Golden Gate Ave., Suite 11000 1300 Broadway, 10th Floor
Madison, WI 53707-7857 Cheyenne, WY 82002	Richmond, VA 23219 Olympia, WA 98504-0100 Charleston, WV 35326	Nashville, TN 37202-0207 Austin, TX 78711-2548 Salt Lake City, UT 84114-2320 Montpelier, VT 05609	Salem, OR 97301-4096 Harrisburg, PA 17120 Providence, Rhode Island 0290 Columbia, SC 29211 Pierre SD 57501-8501	Albany, NY 12224 Raleigh, NC 27602 Bismarck ND 58505 Columbus, OH 43215	Carson City, NV 89701 Concord, NH 03301 Trenton, NJ 08625-0080 Santa Fe NM 87504		Indianapolis, IN 46204 Des Moines IA 50319 Topeka, KS 66612 IFrankfort, KY 40601-3449 Baton Rouge, LA 70804 Augusta, ME 04333 Baltimore, MD 21202 Boston, MA 02108-1518	Washington, DC 20001 Wilmington, DE 19801 Tallahassee, FL 32399-1050 Atlanta, Ga 30334 Honolulu, HI 96813 Boise, ID 83720-0010 Chicago, IL 60601	Washington, DC 20530-0001 Montgomery, AL 36130-0152 Anchorage, AK 99501 Phoenix, AZ 85004 Little Rock, AR 72201 San Francisco, CA 94102 Denver, CO 80203

June 26, 2019

#### VIA FIRST CLASS MAIL

Office of the Attorney General P.O. Box 300152 Montgomery, AL 36130-0152

Re: Stephen Del Sesto et al. v. Prospect Chartercare LLC, et al.,

C.A. No: 1:18-CV-00328-WES-LDA (D.R.I.)

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A final fairness hearing concerning the proposed settlement is scheduled to take place on September 10, 2019, at 10:00 am in Courtroom 2 of the United States District Court for the District of Rhode Island, One Exchange Terrace, Providence, Rhode Island, or at such other date and time later set by Court order.

Please contact me if you have any questions about this notice or require additional information.

Sincerely,

Robert D. Fine Chace Ruttenberg & Freedman, LLP One Park Row, Suite 300 Providence, RI 02903 (401) 453-6400

Counsel for the Settling Defendants

Enclosure

### UNITED STATE 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. :

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Plaintiffs

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

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PROSPECT CHARTERCARE, LLC, ET AL.

Defendants.

DECLARATION OF ROBERT D. FINE, ESQ. REGARDING NOTICE OF PROPOSED SETTLEMENT PURSUANT TO 28 U.S.C. S 1715 ON BEHALF OF ST. JOSEPH HEALTH SERVICES OF RHODE ISLAND

Robert D. Fine hereby declares and states as follows:

- 1. I have personal knowledge of the matters stated herein, and if called to testify as a witness, I could and would testify competently to the following facts.
- 2. I am an attorney with the law firm of Chace Ruttenberg & Freedman, LLP, which serves as counsel for Defendant St. Joseph Health Services of Rhode Island ("SJHSRI") in the above-captioned action.
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 2d of July, 2019 in Rhode Island.

Robert D. Fine

allet V Lux

Robert B. Berkelhammer\*; Nathan W. Chace Douglas J. Emanuel\*\* Robert D. Fine\* Carl J. Freedman Macrina G. Hjerpe\*\* Bret W. Jedele Drew P. Kaplan Richard J. Land\* Allan M. Shine\* Don E. Wineberg\*

Paul T. Cotter\* LuAnn Cserr<sup>\*J</sup> Andre S. Digou\*

Bruce R. Ruttenberg, refred

- \* Also admitted in Massachusetts \* Also admitted in Connecticut
- Also admitted in New York
- \* Also admitted in Washington, D.C.

\*\* Admitted in California

Admitted U.S. Patent & Trademark Office

December 3, 2018

#### VIA FIRST CLASS MAIL

Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001

Re: Stephen Del Sesto et al. v. PROSPECT CHARTERCARE, LLC, et al., C.A. No: 1:18-CV-00328-WES-LDA (D.R.I.)

Dear Sir or Madam:

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With regard to 28 U.S.C. § 1715(b)(2), a fairness hearing regarding SJHSRI's settlement has not yet been scheduled.

With regard to 28 USC § 1715(b)(5), there has been no other settlement of agreement contemporaneously made between class counsel and counsel for SJHSRI.

With regard to USC § 1715(b)(6) and (8), there has been no final judgment or notice of dismissal yet filed relating to SJHSRI's proposed settlement.

With regard to 28 U.S.C. § 1715(b)(7), SJHSRI cannot provide the "estimated proportionate share of the claims of such members to the entire settlement," 28 U.S.C. §§ 1715(b)(7)(A), 1715(b)(7)(B), because the settlement will be paid into the St. Joseph Health Services of Rhode Island Retirement Plan, not distributed to individual class members. Moreover, the final amount of the settlement has not yet been determined, as it depends on subsequent collection efforts by Plaintiffs and Plaintiffs' Counsel.

For your information, all of the filings in this proceeding and related cases are available at the Receiver's website: <a href="https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan">https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan</a>.

Please contact the undersigned if you have any questions about this notice or require additional information.

Sincerely,

Robert D. Fine

**Enclosures** 

Wisconsin Department of Justice Office of the Attorney General	Office of the Attorney General Office of the Attorney General Office of the Attorney General	Office of the Attorney General and Reporter Office of the Attorney General Utah State Capitol Office Mailing Address Vermont Attorney General's Office	Pennsylvania Office of Attorney General Office of the Attorney General Attorney General Alan Wilson Office of the Attorney General	Attorney General's Office Office of the Attorney General Ohio Attorney General Mike DeWine Oklahoma Office of the Oklahoma Attorney General Attorney General	NH Department of Justice Office of The Attorney General Office of the Attorney General Office of the Attorney General	Office of Minnesota Attorney General MS Attorney General's Office Missouri Attorney General's Office Office of the Attorney General's Office Office of the Attorney General's Office Office of the Attorney General	Office of the Indiana Attorney General Office of the Attorney General of Iowa Kansas Attorney General Office of the Attorney General	Office of the Attorney General Office of the Attorney General for the District of Columbia Delaware Department of Justice Office of Attorney General Office of the Attorney General Department of the Attorney General Idaho Office of the Attorney General Office of the Illinois Attorney General	Attorney General of the United States Office of the Attorney General Attorney General Jahna Lindemuth Office of the Arizona Attorney General Office of the Attorney General CAFA Coordinator Office of the Attorney Genera,
					RJ Hughes Justice Complex The Capitol	C. PASHING THE HEALTH DESIGNATION	O Manage Williams Building		Office of the Attorney General Colorado Department of Law
Kendrick Building	1125 Washington Street SE	Office of the Attorney General		Department of Justice State Capitol Oregon Department of Justice	Gordon J. MacDonald, Attorney General 25 Market Street Department of Law	State Capital, Suite 102 Supreme Court Building 2115 State Capitol	Indiana Government Center South Hoover State Office Building	Carvel State Building State of Florida 700 W. Jefferson Street, Suite 210	U.S. Department of Justice  Consumer Law Section  Ralph L. Carr Judicial Building
P.O. Box 7857 2320 Capitol Avenue	202 North Ninth Street PO Box 40100 PO Box 1789	P.O. Box 20207 PO Box 12548 PO Box 142320 109 State Street	Strawberry Square, 16th FI 150 South Main Street P.O. Box 11549 1302 E Hwy 14, Suite 1	PO Box 629 600 E. Boulevard Avenue 30 E. Broad St., 14th Floor 313 NE 21st Street 1162 Court St. NE	33 Capitol Street PO Box 080 PO Drawer 1508 Justic Building, 2nd Floor	75 Dr. Martin Luther King Boulevard P.O. Box 220 207 W. High St 215 N Sanders St PO Box 98920 100 North Carson Street	302 W. Washington St., 5th Floor 1305 E. Walnut Street 120 SW 10th Ave., 2nd Floor 700 Capitol Avenue, Suite 118 Post Office Box 94095 6 State House Station 200 St. Paul Place 1 Ashburton Place	411 4th Street, Ste. 1100S 441 4th Street, NW 820 N. French St The Capitol PL-01 40 Capitol Square, SW 425 Queen Street P.O. Box 83720 100 West Randolph Street	P.O. Box 300152 P.O. Box 300152 1031 West 4th Avenue, Suite 200 2005 N. Central Avenue 323 Center Street, Suite 200 455 Golden Gate Ave., Suite 11000 1300 Broadway, 10th Floor
Madison, WI 53707-7857 Cheyenne, WY 82002	Richmond, VA 23219 Olympia, WA 98504-0100 Charleston, WV 35326	Nashville, TN 37202-0207 Austin, TX 78711-2548 Salt Lake City, UT 84114-2320 Montpelier, VT 05609	Harrisburg, PA 17120 Providence, Rhode Island 0290 Columbia, SC 29211 Pierre SD 57501-8501	Raleigh, NC 27602 Bismarck ND 58505 Columbus, OH 43215 Oklahoma City, OK 73105 Salem, OR 97301-4096	Concord, NH 03301 Trenton, NJ 08625-0080 Santa Fe, NM 87504 Albany, NY 12224		Indianapolis, IN 46204 Des Moines IA 50319 Topeka, KS 66612 IFrankfort, KY 40601-3449 Baton Rouge, LA 70804 Augusta, ME 04333 Baltimore, MD 21202 Boston, MA 02108-1518	Washington, DC 20001 Wilmington, DE 19801 Wilmington, DE 19801 Tallahassee, FL 32399-1050 Atlanta, Ga 30334 Honolulu, HI 96813 Boise, ID 83720-0010 Chicago, IL 60601	Washington, DC 20530-0001 Montgomery, AL 36130-0152 Anchorage, AK 99501 Phoenix, AZ 85004 Little Rock, AR 72201 San Francisco, CA 94102 Denver, CO 80203

June 26, 2019

VIA FIRST CLASS MAIL

Office of the Attorney General P.O. Box 300152 Montgomery, AL 36130-0152

Re: Stephen Del Sesto et al. v. Prospect Chartercare LLC, et al.,

C.A. No: 1:18-CV-00328-WES-LDA (D.R.I.)

Dear Sir or Madam:

This notice concerns a proposed class action settlement in the abovereferenced matter currently pending in the U.S. District Court for the District of Rhode Island.

On December 3, 2018, CharterCARE Community Board, St. Joseph Health Services of Rhode Island and Roger Williams Hospital (collectively referred to herein as the "Settling Defendants") jointly provided notice of this proposed settlement to all appropriate state and federal officials pursuant to the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715.

Information concerning this proposed settlement, including copies of the Complaint, Amended Complaint, and a complete copy of the Settlement Agreement entered into as of August 31, 2018, is available at <a href="https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan">https://www.pierceatwood.com/receivership-filings-st-joseph-health-services-rhode-island-retirement-plan</a>.

On June 6, 2019, the Honorable William E. Smith, Chief Judge of the U.S. District Court for the District of Rhode Island, issued an order granting preliminary approval of the proposed settlement (hereinafter, the "Order"). The Order is also available at the above web site. The Order states that Class Notice should be provided to appropriate state and federal officials pursuant to CAFA, if required. Although notice to you may not be required under CAFA, out of an abundance of caution, this notice is being sent to the appropriate state official of each state as well as the U.S. Attorney General. The Settling Defendants now provide your office with a copy of the enclosed Class Notice concerning the proposed settlement.

A final fairness hearing concerning the proposed settlement is scheduled to take place on September 10, 2019, at 10:00 am in Courtroom 2 of the United States District Court for the District of Rhode Island, One Exchange Terrace, Providence, Rhode Island, or at such other date and time later set by Court order.

Please contact me if you have any questions about this notice or require additional information.

Sincerely,

Robert D. Fine Chace Ruttenberg & Freedman, LLP One Park Row, Suite 300 Providence, RI 02903 (401) 453-6400

Counsel for the Settling Defendants

Enclosure