

**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 extending all deadlines in the Court’s February 1, 2022 order, ECF No. 233, attached at Exhibit A. In support thereof, the Parties state:

1. Following Attorney Merten’s return to the office after recovering from Covid-19, counsel for the Diocesan Defendants have worked diligently to make up ground lost during Attorney Merten’s absence, but find they need an additional week to complete the briefing contemplated during the December 10, 2021 chambers conference.
2. Given the scope of that briefing, the Parties also recognized that Plaintiffs will likely need additional time to prepare their response.
3. 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 February 1, 2022 order as follows: (A) The Diocesan Defendants shall file their motion papers on or before February 11, 2022; (B) Plaintiffs' response is due on or before March 28, 2022; and (C) The Diocesan Defendants' reply is due on or before April 11, 2022.

Dated: February 4, 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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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 February 4, 2022.

/s/ Howard Merten_____

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EXHIBIT A

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

STEPHEN DEL SESTO, AS RECEIVER
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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 February 1, 2022 order, ECF No. 233, as follows:

1. The Diocesan Defendants shall file their motion papers on or before February 11, 2022.
2. Plaintiffs’ response is due on or before March 28, 2022.
3. The Diocesan Defendants’ reply is due on or before April 11, 2022.

IT IS SO ORDERED:

Hon. William E. Smith
Chief United States District Judge

Dated: February __, 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

STEPHEN DEL SESTO, AS RECEIVER
AND ADMINISTRATOR OF THE ST.
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