

**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 December 10, 2021 text order by two weeks, attached at Exhibit A. In support thereof, the Parties state:

1. Following the holidays, Attorney Merten and several members of his family contracted Covid-19.
2. Attorney Merten has since made a full recovery.
3. The requested extension of all deadlines is necessary to permit the Diocesan Defendants to complete the contemplated briefing and 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 December 10, 2021 text order as

follows: (A) The Diocesan Defendants shall file their motion papers on or before February 4, 2022; (B) Plaintiffs' response is due on or before March 7, 2022; and (C) The Diocesan Defendants' reply is due on or before March 21, 2022.

Dated: January 19, 2022

Respectfully Submitted,

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

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

By Their Attorneys,

By Their Attorneys,

PARTRIDGE SNOW & HAHN LLP

WISTOW, SHEEHAN & LOVELEY, PC

/s/ Howard Merten

/s/ Stephen P. Sheehan

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Eugene G. Bernardo (#6006)  
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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 January 19, 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  
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

**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 December 10, 2021 text order as follows:

1. The Diocesan Defendants shall file their motion papers on or before February 4, 2022.
2. Plaintiffs’ response is due on or before March 7, 2022.
3. The Diocesan Defendants’ reply is due on or before March 21, 2022.

IT IS SO ORDERED:

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Hon. William E. Smith  
Chief United States District Judge

Dated: January \_\_, 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.  
JOSEPH HEALTH SERVICES OF RHODE  
ISLAND RETIREMENT PLAN, et al.

By Their Attorneys,

WISTOW, SHEEHAN & LOVELEY, PC

/s/ Howard Merten

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/s/ Stephen P. Sheehan

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