

**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**

Defendants Roman Catholic Bishop of Providence, a corporation sole, Diocesan Administration Corporation, and Diocesan Service Corporation (collectively, the “Diocesan Defendants”) and Plaintiff Stephen Del Sesto (the “Receiver”) and the individual named plaintiffs (individually and as putative class representatives) (with the Receiver, “Plaintiffs”) move for entry of the stipulation and proposed order extending the remaining deadlines in the Court’s April 11, 2022 order, ECF No. 242, attached at Exhibit A. In support thereof, the Parties state:

1. Plaintiffs filed their oppositions to the Diocesan Defendants’ motion for summary judgment and renewed motion to dismiss on April 18, 2022. Plaintiffs also filed a conditional motion for discovery under Rule 56(d) on the same day.
2. Given the scope of Plaintiffs’ briefing, the Diocesan Defendants have determined that they will need an extension until June 3, 2022 to complete their responses to Plaintiffs’ oppositions and conditional motion.
3. Plaintiffs have agreed to the extension.

4. The requested extension will not result in prejudice to any party.

Wherefore, the Parties respectfully request the entry of the attached stipulation and proposed order extending the remaining deadlines in the Court's April 11, 2022 order as follows: The Diocesan Defendants shall file their replies in further support of their motion for summary judgment and renewed motion to dismiss, as well as their response to Plaintiffs' Rule 56(d) conditional motion, on or before June 3, 2022.

Dated: April 29, 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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**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 29, 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**

Defendants Roman Catholic Bishop of Providence, a corporation sole, Diocesan Administration Corporation, and Diocesan Service Corporation (collectively, the “Diocesan Defendants”) and Plaintiff Stephen Del Sesto (the “Receiver”) and the individual named plaintiffs (individually and as putative class representatives) (with the Receiver, “Plaintiffs”) stipulate and agree to the extension of the remaining deadlines set out in the Court’s April 11, 2022 order, ECF No. 242, as follows:

1. The Diocesan Defendants shall file their replies in further support of their motion for summary judgment and renewed motion to dismiss on or before June 3, 2022.
2. The Diocesan Defendants shall also file their opposition to Plaintiffs’ conditional motion for discovery under Rule 56(d) on or before June 3, 2022.

IT IS SO ORDERED:

\_\_\_\_\_  
Hon. William E. Smith  
Chief United States District Judge

Dated: \_\_\_\_\_, 2022

So stipulated:

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

STEPHEN DEL SESTO, AS RECEIVER  
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By Their Attorneys,

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