

Exhibit B

Memorandum of Points and Authorities in Support of
Defendant's Motion to Dismiss Amended Complaint

Dr. de la Torre v. Sanders, et al., No. 1:24-cv-02776-TNM

III

118TH CONGRESS
2D SESSION

S. RES. 837

Authorizing the President of the Senate to certify the report of the Committee on Health, Education, Labor, and Pensions of the Senate regarding the refusal of Dr. Ralph de la Torre to appear and testify before the Committee.

IN THE SENATE OF THE UNITED STATES

SEPTEMBER 23, 2024

Mr. SANDERS, from the Committee on Health, Education, Labor, and Pensions, reported the following original resolution; which was placed on the calendar

SEPTEMBER 25, 2024

Considered and agreed to

RESOLUTION

Authorizing the President of the Senate to certify the report of the Committee on Health, Education, Labor, and Pensions of the Senate regarding the refusal of Dr. Ralph de la Torre to appear and testify before the Committee.

Whereas the Committee on Health, Education, Labor, and Pensions of the Senate (referred to in this preamble as the “Committee”) is currently conducting a duly authorized investigation into the bankruptcy of Steward Health Care Systems LLC;

Whereas, on July 25, 2024, the Committee issued a duly authorized subpoena to Dr. Ralph de la Torre, Chairman

and Chief Executive Officer of Steward Health Care Systems LLC, directing him to testify before the Committee on September 12, 2024, at 10:00 a.m.;

Whereas, on September 4, 2024, counsel for Dr. de la Torre submitted to the Committee objections to the compelled testimony under the subpoena issued by the Committee and indicated Dr. de la Torre's intent to decline to comply with the subpoena;

Whereas, having considered the legal objections that had been submitted by counsel for Dr. de la Torre, the Committee overruled those objections in their entirety on September 5, 2024, and ordered and directed that Dr. de la Torre comply with the subpoena issued by the Committee to testify at 10:00 a.m. on September 12, 2024; and

Whereas Dr. de la Torre has refused to comply with the subpoena by the Committee as ordered and directed by the Committee: Now, therefore, be it

1 *Resolved*, That pursuant to sections 102 and 104 of
2 the Revised Statutes (2 U.S.C. 192, 194), the President
3 of the Senate shall certify the report of the Committee
4 on Health, Education, Labor, and Pensions of the Senate,
5 detailing the refusal of Dr. Ralph de la Torre, Chairman
6 and Chief Executive Officer of Steward Health Care Sys-
7 tems LLC, to appear and testify before the Committee,
8 to the United States Attorney for the District of Colum-
9 bia, to the end that Dr. de la Torre be proceeded against
10 in the manner and form provided by law.

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