

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Michael Humphreys, Acting Insurance
Commissioner of the Commonwealth of
Pennsylvania in his capacity as the Statutory
Rehabilitator of Senior Health Insurance
Company of Pennsylvania,

Plaintiff,

v.

Brian Wegner, Paul Lorentz, Barry Staldine,
and Protiviti, Inc.

Defendants.

No. 1 SHP 2022

**JOINT STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Pennsylvania Rules of Appellate Procedure 105 and 106, and Pennsylvania Rule of Civil Procedure 248, Plaintiff Michael Humphreys, Acting Insurance Commissioner of the Commonwealth of Pennsylvania, in his capacity as the Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania (“Rehabilitator”), and Defendants Brian Wegner, Paul Lorentz, Barry Staldine, and Protiviti, Inc. (together with the Rehabilitator, the “Parties”) enter into this Stipulation to Extend Time to Respond to Plaintiff’s Amended Complaint. In entering this stipulation, the Parties state:

WHEREAS, on June 22, 2022, Defendants, through their counsel, were served with the Amended Complaint filed in this action on June 22, 2022.

WHEREAS, Defendants' deadline to respond to the Amended Complaint is currently July 12, 2022.

WHEREAS, after conferring about the nature of this action, the Parties have agreed that good cause exists for an extension of Defendants' deadline to respond to the Amended Complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties represented by undersigned counsel, that the deadline for Defendants to respond (Answer or otherwise Plead) to Plaintiff's Amended Complaint is extended to **August 26, 2022**. Nothing herein shall preclude the Parties from agreeing to, or seeking Court leave to allow, further extensions to the response deadline as circumstances require.

Dated: July 12, 2022

<p>By: <u>/s/ Michael J. Broadbent</u> Michael J. Broadbent Dexter R. Hamilton Eric D. Freed Matthew J. Siegel COZEN O'CONNOR One Liberty Place 1650 Market Street, Suite 2800 Philadelphia, PA 19103 mbroadbent@cozen.com dhamilton@cozen.com efreed@cozen.com msiegel@cozen.com</p> <p><i>Attorneys for the Rehabilitator</i></p>	<p>By: <u>/s/ James J. Kutz</u> James J. Kutz Erin R. Kawa POST & SCHELL, P.C. 17 North Second St., 12th Fl. Harrisburg, PA 17101</p> <p>Shawn Naunton (<i>pro hac vice</i>) Devon Galloway (<i>pro hac vice</i>) ZUCKERMAN SPAEDER LLP 485 Madison Ave., 10th Fl. New York, NY 10022 snaunton@zuckerman.com dgalloway@zuckerman.com</p> <p>Alyssa Howard (<i>pro hac vice</i>) ZUCKERMAN SPAEDER LLP 1800 M St. NW, Ste. 1000 Washington, D.C. 20036 ahoward@zuckerman.com</p> <p><i>Attorneys for Defendant Brian Wegner</i></p>
<p>By: <u>/s/ Casey Alan Coyle</u> Casey Alan Coyle ECKERT SEAMANS CHERIN & MELLOTT, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 Telephone: 717-237-7192 Facsimile: 717-237-6019 ccoyle@eckertseamans.com</p> <p><i>Attorney for Defendant Paul Lorentz</i></p>	<p>By: <u>/s/ Perry A. Napolitano</u> Perry A. Napolitano Justin J. Kontul REED SMITH LLP 225 Fifth Avenue Suite 1200 Pittsburgh, PA 15222-2716 pnapolitano@reedsmith.com jkontul@reedsmith.com</p> <p><i>Attorneys for Defendant Protiviti Inc.</i></p>

By: /s/ James J. Black, III

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CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

POST & SCHELL, P.C.

/s/ James J. Kutz

BY:

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Date: July 12, 2022

CERTIFICATE OF SERVICE

I, James J. Kutz, Esquire, hereby state that I have this day caused to be served a true and correct copy of the foregoing document upon the persons and at the addresses below named via the Court's PACFile System and U.S. Mail, First-Class, postage prepaid, as follows, which satisfies the requirements of PA. R.A.P. 121 and 1514(c):

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Date: July 12, 2022

/s/ James J. Kutz

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