

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

JESSICA K. ALTMAN, INSURANCE
 COMMISSIONER OF THE
 COMMONWEALTH OF
 PENNSYLVANIA IN HER 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 COMPLAINT**

Pursuant to Pennsylvania Rules of Appellate Procedure 105 and 106, and Pennsylvania Rule of Civil Procedure 248, Defendant Protiviti Inc. and Plaintiff Jessica K. Altman, Insurance Commissioner of the Commonwealth of Pennsylvania in her capacity as the Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania (collectively, the "Parties"), enter into this Joint Stipulation to Extend Time to Respond to Plaintiff's Complaint. In entering this Stipulation, the Parties state:

WHEREAS, Plaintiff filed a Complaint against Protiviti, Inc. and three other defendants on January 28, 2022.

WHEREAS, Protiviti, Inc.'s deadline to respond to the Complaint is currently March 31, 2022.

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

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties represented by undersigned counsel, that the deadline for Protiviti, Inc. to respond (Answer or otherwise Plead) to Plaintiff's Complaint is extended to **May 2, 2022**. Nothing herein shall preclude the Parties from agreeing to, or seeking Court leave to allow, extensions to the response deadline as circumstances require.

Respectfully submitted,

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Commonwealth of Pennsylvania in her
capacity as the Statutory Rehabilitator
of Senior Health Insurance Company of
Pennsylvania*

Dated: March 30, 2022

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.

Submitted by: Justin J. Kontul

Signature: /s/ Justin J. Kontul

Attorney No.: 26026

PROOF OF SERVICE

I hereby certify that on this 30th day of March, 2022, I am serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of Pa.R.A.P. 121:

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