

## 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	:	DOCKET NO.: 2 SHP 2022
Pennsylvania ("SHIP"),	:	
	:	JURY TRIAL DEMANDED
Plaintiff,	:	
	:	
v.	:	
	:	
Vanbridge, an EPIC Company;	:	
Vanbridge LLC (f/k/a VBR Holdings,	:	
LLC, f/k/a Vanbridge Holdings, LLC);	:	
Roebling Re Ltd.; Dixon Hughes	:	
Goodman, LLP; Golden Tree Asset	:	
Management LP;	:	
Bruckner Charitable Trust; and	:	
Bruckner Investment Trust	:	
Defendants.	:	

**CERTIFICATE OF MERIT AS TO DEFENDANT, VANBRIDGE**

I, Leslie Miller Greenspan, Esquire, certify pursuant to Pa. R.C.P. 1042.3

that:

- ☒ an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this defendant in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

**AND/OR**

- ☐ the claim that this defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this entity is responsible deviated from an acceptable professional standard and an appropriate licensed professional has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

**OR**

- ☐ expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this defendant.

Date: May 31, 2022

/s/ Leslie Miller Greenspan

Leslie Miller Greenspan  
(PA ID 91639)

**TUCKER LAW GROUP**

Ten Penn Center  
1801 Market Street, Suite 2500  
Philadelphia, PA 19103

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Leslie Miller Greenspan, hereby certify that on May 31, 2022, I caused to be filed the foregoing document through the Court's PACFile system, and that notice was provided to all parties listed on the Master Service List associated with 1 SHP 2020. In addition, I hereby certify that electronic copies of the foregoing documents will be posted on SHIP's website at <https://www.shipltc.com/court-documents>.

/s/ Leslie Miller Greenspan  
Leslie Miller Greenspan