

**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, 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 ("Rehabilitator"), and Defendant Barry Staldine (together with the Rehabilitator, the "Parties"), enter into this Stipulation to Extend Time to Respond to Plaintiff's Complaint. In entering this stipulation, the Parties state:

WHEREAS, on February 5, 2022, Mr. Staldine was personally served with the Complaint filed in this action on January 28, 2022.

WHEREAS, Mr. Staldine's deadline to respond to the Complaint is currently February 25, 2022.

WHEREAS, undersigned counsel for Mr. Staldine was recently retained.

WHEREAS, after conferring about the nature of this action, the Parties have agreed that good cause exists for an extension of Mr. Staldine'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 Mr. Staldine to respond (Answer or otherwise Plead) to Plaintiff's Complaint is extended to **March 31, 2022**. Nothing herein shall preclude the Parties from agreeing to, or seeking Court leave to allow, extensions to the response deadline as circumstances require.

February 24, 2022

/s/ Michael J. Broadbent  
Michael J. Broadbent  
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Matthew Siegel  
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*Attorneys for Barry Staldine*

**CERTIFICATE OF SERVICE**

I, Michael J. Broadbent, hereby certify that on February 24, 2022, I caused to be filed the foregoing JOINT STIPULATION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT 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. Other service will be effectuated in accordance with applicable Rules. In addition, I hereby certify that electronic copies of the foregoing documents will be posted on SHIP's website at <https://www.shipltc.com/courtdocuments>.

By: /s/ Michael J. Broadbent  
Michael J. Broadbent